

ETHICAL CHARTER

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INTRODUCTION

Our Mission:

Protect, preserve, and maximise the value of natural resources and our clients' products with metal packaging that is effective, safe, and recyclable.

Our reason to believe in this mission: 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 recycled at a rate of 76.9% in 2022 in Europe, according to Eurostat. As the most effective solution on the market, metal packaging has a bright future in terms of:

- o avoiding wastage of the world's precious food resources
- o protecting, preserving for protracted periods, and maximising value without expending energy
- o preserving natural resources and fostering the emergence of the circular economy
- o all while remaining affordable and practical for everybody, at all times

Our Values:

Our key fundamental values are rooted in people: our employees, our clients, and their consumers; from infants to the elderly.

We strive to be:

- **Humane:** We provide our employees with a safe, pleasant, and rewarding work environment. We make no compromises when it comes to workstation safety. 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 keep a watchful eye to ensure that our business is conducted in strict compliance with human rights. We are committed to nurturing the involvement and engagement of our employees, encouraging them to contribute to our efforts to continuously improve.
- **Collectively responsible for ensuring the safety and quality of our packaging:** 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 our products. Quality is the key to our future.
- **Committed and attentive to our clients:** In a world that 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.
- **Creators of value both in-house and externally:** Our work is informed by a commitment to continuous improvement and innovation, a philosophy which is non-negotiable as we seek to progress, to offer our clients competitive prices and maintain our position as a major independent player in the market. We are always investing in developing the skills of our employees, as well as optimising our production facilities.

- **Respectful of the environment:** Our packaging solutions help reduce food waste and are made of metal; a material that is endlessly recyclable. We bring all these benefits to bear to optimise the use of natural resources and become part of a circular economy approach. As part of those efforts, we strive to reduce the strain on biodiversity and the climate impact caused by greenhouse gas emissions. Our approach also targets the direct and indirect impacts of our business activities.

Our Goal:

We want to promote metal packaging and its benefits to make it modern consumers' preferred solution. We also aim to be our clients' preferred supplier by guaranteeing them packaging solutions that are:

- 100% safe in terms of food security, hygiene, and quality; protecting their products and their consumers
- Attractive packaging that enhances the appeal of their 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 our 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 equipment on the market. We constantly strive to develop new and effective forms of synergy to benefit our clients (adaptable production, a broad range of products, cost reductions).

At the same time, we wish to remain a local partner, familiar with and involved in local issues and the specific characteristics of local markets. Our high degree of adaptability enables us to readjust in response to changes, so that we can always offer the most suitable solution to meet the needs of our clients, big or small.

Our production facilities are part of day-to-day life in the regions where they are located. In line with our values and drive for sustainable development, they actively participate in local initiatives. As such, each of us makes every effort to do our part in creating a positive collective impact.

Why publish an Ethical Charter?

In this Charter, Massilly sets out the ethical values that underpin its mission of corporate social responsibility. As part of that mission, Massilly makes a commitment to involve all its representatives, employees, and other third parties to whom this Charter is disseminated.

Furthermore, Massilly has implemented policies and set out specific guidelines to help them adopt the best possible practices.

Beyond its in-house organisation, Massilly aims to bring together its value chain by fostering and promoting engagement among the stakeholders to whom this Charter is disseminated.

Massilly intends that its partners be made aware of this Charter and see to its implementation through their own commitments.

1. RESPECT FOR PEOPLE

a. Respect for human rights

In addition to the applicable regulations, Massilly makes a commitment to respect and promote human rights in the context of its business activities in France and abroad.

We ensure that all parties comply with the following texts: the 1948 Universal Declaration of Human Rights; the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work; and the United Nations' Guiding Principles on Business and Human Rights of 16 June 2011. Massilly has been a signatory of the United Nations Global Compact since 2024.

In addition to complying with these global declarations, the group pays close attention to the issues addressed by the ILO's Fundamental Conventions, such as the prohibition of child labour and forced labour.

Massilly's international presence means that this charter and our business activities will comply with the social and cultural traditions of our employees. Furthermore, if local laws impose more stringent standards than those set out in the Charter, it is the local laws that take precedence. Conversely, if the Charter imposes higher standards than the local laws, it is the rules of the Charter that will be applied.

b. Harassment and violence in the workplace

Massilly makes a commitment to guarantee a working environment devoid of harassment for all its employees and partners. We do not tolerate any form of harassment, whether bullying or sexual harassment, nor any form of violence or behaviour that results in a threatening work environment.

Massilly promotes respect and dignity for all its employees.

c. Equal opportunities, discrimination, and diversity

Massilly makes a commitment to ensure equal opportunities for all its employees. As part of

that commitment, we require all our employees and partners to promote a work environment free of discrimination and/or mistreatment on the basis of gender, age, religion, race, family status, social background, illness, disability, pregnancy, country of origin and ethnicity, membership of a labour organisation, political affiliation, sexual preference, physical appearance, or any other of an individual's personal characteristics.

Massilly makes a commitment to combat all forms of occupational and workplace discrimination. We prohibit all forms of discrimination in relation to recruitment, promotion, remuneration, job retention, and working conditions.

Massilly promotes diversity within its facilities in areas such as the following: gender, disability, age, and multiculturalism.

d. Training and career management

As a player at the local level, Massilly is committed to developing the skills of the employees in the regions where it operates.

Developing employees' skills is part of a drive for continuous improvement. Massilly is working towards a significant training program tailored to the needs of the employees and the group.

We place a high value on in-house promotions through career advancement opportunities, as well as the handing down of knowledge within our various business lines.

Massilly promotes training for all its employees and provides human and material resources to that end. The employees are committed to making every effort to participate in the training processes put in place by the group.

Massilly expects all its employees to commit to complying with the rules that apply to them in terms of their own behaviour and all their fellow employees.

Massilly expects its partners—whether based in our facilities or elsewhere—to comply with human rights standards equivalent, at a minimum, to those set out in this Charter, and make a commitment to provide any information requested in the spirit of sincerity and transparency. Furthermore, that they monitor actions related to critical standards, such as forced labour and child labour, and that they ensure a work environment that is sanitary, safe, and respectful of the rights of each individual.

These commitments constitute a shared objective that Massilly means to achieve together with all its partners.

2. SAFETY

Health and safety take top priority for Massilly and, as such, the group ensures a work environment that is sanitary and safe, and that prevents the occurrence 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. All our teams are continuously working on developing a culture of workplace safety. This philosophy is put into practice across all of our locations in the form of specific safety policies which incorporate the applicable local standards.

Employees are encouraged to share any observations or insights related to safety in order to enhance and strengthen safety practices throughout the company. Any dysfunctions or incidents that could pose a risk to safety must be promptly reported.

Massilly expects its employees to comply with health and safety regulations.

Massilly expects all its partners—whether based in our facilities or elsewhere—to comply with the rules we have set out, and to pursue and implement an improvement process to ensure the health and safety of their employees.

3. ENVIRONMENT

In addition to compliance with environmental standards, Massilly wishes to reduce the direct and indirect impact of its activities on the environment. This includes reducing the strain on biodiversity and reducing greenhouse gas emissions that contribute to climate change.

For example, with the goal of reducing the environmental footprint of products, we are committed to reducing our consumption of energy and water resources, improving our management of waste material and rejected products, limiting consumption of natural resources, and optimising the transport of our products.

Massilly expects its employees to rigorously apply the environmental management system and comply with all environmental procedures in order to detect and rectify any identified risk.

A significant portion of Massilly's environmental impact is of an indirect nature: originating from various points along our supply chain. **As such, Massilly expects that its partners** will:

- comply with all applicable environmental regulations;
- pursue a drive for continuous improvement in relation to their environmental impacts and those of their value chain;
- ensure transparency with regard to environmental information concerning their activities and products and provide Massilly with any such information that may be requested in the context of surveys and audits.

4. QUALITY

The quality of our products and services—along with food safety for our clients and consumers—are among Massilly's highest priorities.

From the reception of raw materials to the manufacturing and distribution of our products, Massilly ensures that its products and processes comply with the leading international quality systems.

At each stage of the manufacturing process, we test our products according to our own in-house procedures, the best practices of our industry, as well as international frames of reference.

Massilly expects its employees to be fully committed to this approach of vigilance and compliance with in-house regulations. They must see to it that the quality control and food safety plan are applied in compliance with the group's policies.

Massilly expects its suppliers to make the following commitments:

- to comply with the applicable regulations on materials and substances of concern (REACH),
- to comply with our standards relating to food safety and product quality as set out in our order specifications
- to demonstrate the effectiveness of their quality management system
- to respond to any inquiries made by Massilly with full transparency in the context of supplier evaluations

5. BUSINESS ETHICS

a. Responsible business practices

Massilly makes every effort to ensure the promotion of its products with up-to-date and high-quality technical assistance that is accurate and suitable to ensure the proper use of our products, as always in compliance with the applicable regulations.

Massilly endeavours to develop long-lasting commercial relationships that are beneficial to the entire value chain.

We undertake a responsible procurement policy that incorporates the standards relating to respect for the environment, social progress, and mutual business growth with our suppliers.

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

b. Fighting corruption

Massilly places particular importance on conducting its business with integrity and fighting all forms of corruption.

To that end, and in addition to the anti-corruption laws in force in the countries where it does business, Massilly has its own policy for preventing, detecting, and penalising corrupt practices.

c. Fair competition

Massilly intends to establish its market position through free and fair competition and to maintain our clients' and consumers' trust in metal packaging as a sustainable solution.

To that end, and in addition to strictly complying with the applicable regulations, Massilly implements an in-house policy aimed at preventing, detecting, and penalising corrupt practices.

d. Transparency and Compliance

Massilly comprehensively documents all its activities, notably in relation to accounting standards and, as such, makes a commitment that all its published financial and non-financial information is accurate, truthful, and valid.

Massilly meets its obligations, in particular fiscal obligations, in all the jurisdictions where its activities and facilities are located.

Massilly operates in compliance with national and international commercial and economic sanctions and restrictions.

Massilly supports a "zero-tolerance" policy with regard to all forms of fraud and other illegal practices.

e. Data protection

Massilly takes care to respect privacy and makes every effort to minimise the processing and retention of personal data, as always in compliance with the applicable regulations.

As part of these efforts to protect personal or confidential data, Massilly pays particular attention to cybersecurity.

Massilly expects its employees to agree to comply with the ethical rules relating to them.

In addition to strictly complying with all applicable regulations, **Massilly expects its business partners**—its suppliers first and foremost—to comply with ethical standards at least equivalent to those set out in this Charter.

Massilly calls on its suppliers to provide a transparent response to any request for information aimed at verifying their ethical compliance.

THE WHISTLE-BLOWING SYSTEM

Massilly has established and maintains a unique whistle-blowing system aimed at gathering any report of practices that are illegal or non-compliant with this Charter. Such an alert may be raised by Massilly employees or third parties by sending a message to the following address:

ETHIC@MASSILLY.COM

This whistle-blowing system is supplementary to the usual reporting channels and offers specific protective guaranties for whistle-blowers.

Massilly encourages the use of this system to promote an ethical work environment.

Massilly's management team is committed to enforcing the content of this charter. It periodically verifies the proper implementation and updating of the Charter in Massilly's policies and procedures.

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