



Supplier Code of Conduct

Sonoco Metal Packaging EMEA, through its worldwide family of companies (“Sonoco Metal Packaging EMEA”), is committed to acting ethically and responsibly in all facets of our operations. Sonoco Metal Packaging EMEA’s Code of Business Conduct and Ethics (the “Code”), applies to the company’s employees and representatives and is available on its website. In that document, Sonoco Metal Packaging EMEA commits to follow the words, as well as the spirit, of the law in the countries where it operates and requires all its employees to strive to adhere to the highest standards of ethics, morality, honesty and decency in the performance of their duties.

This Supplier Code of Conduct (the “Supplier Code”), which is informed by the Code and other important public principles such as the United Nations Global Compact, is designed to align the ethical objectives and conduct of all of Sonoco Metal Packaging EMEA’s suppliers, all over the world, with the standards that Sonoco Metal Packaging EMEA applies to its own personnel. Sonoco Metal Packaging EMEA expects each supplier to comply with the principles described below, or comparable provisions of its own code of conduct, in all its dealings with Sonoco Metal Packaging EMEA.

Sustainability is a basic value at Sonoco Metal Packaging EMEA. One key driver of this Supplier Code is to ensure that our suppliers understand and are aligned with our sustainability values. We encourage our suppliers to continuously work to implement sustainable development principles like the ones in this Supplier Code in their own operations and in their supply chain.

To Whom Does This Supplier Code Apply?

A Sonoco Metal Packaging EMEA supplier is any third party with whom Sonoco Metal Packaging EMEA has an active commercial relationship for the supply of goods or services. This includes suppliers of raw materials and machinery, suppliers of other goods and services, contractors, consultants, brokers and agents. Sonoco Metal Packaging EMEA reserves the right to add to or modify this Supplier Code from time to time. Suppliers are expected to comply with the latest version of this Supplier Code that is posted on SMP EMEA’s website or that is otherwise provided directly to them.

The Principles of the Supplier Code

All suppliers must adhere to the following principles:

Compliance with Law

Suppliers must comply with the words and spirit of all applicable laws, rules, regulations and orders of all government bodies in the performance of their business.



Human Rights/Employment Practices/Health & Safety

Sonoco Metal Packaging EMEA expects its suppliers to support and respect the protection of human rights and ensure they are not complicit in human rights abuses. Sonoco Metal Packaging EMEA expects its suppliers to follow universally-accepted employment practices and to prioritize health and safety. In particular, SMP EMEA requires the following:

- Suppliers shall not employ anyone under the legal working age.
- Suppliers shall not permit the use of forced or compulsory labor, slavery or human trafficking in their own facilities or in their supply chain.
- Suppliers shall provide a workplace free from harassment, including sexual, verbal, physical or demonstrative behavior that creates an offensive, hostile or intimidating environment.
- Suppliers shall not discriminate against current or prospective employees on grounds of race, ethnicity, color, national origin, ancestry, nationality, citizenship, religion, age, gender (including gender identity or expression), sexual orientation, disability, genetic information, uniformed service, veteran's status or any other characteristic protected by applicable law, ordinance or regulation.
- Suppliers shall endeavor to provide a safe work environment in compliance with all applicable laws or, in the absence of applicable laws, best industry practices. Suppliers shall take actions to minimize accidents, injury and illness during the course of work.
- Suppliers shall recognize the rights of freedom of association and collective bargaining under applicable law.
- Suppliers shall comply with all applicable labor laws, including those related to wages, overtime, vacations, absences, disability, maximum working hours and legal right to work.

Environment

At Sonoco Metal Packaging EMEA, environmental commitment is a fundamental part of our business philosophy. We recognize that the protection of human health and the environment is a sound business practice that conserves resources and safeguards employees, customers, the general public and the environment.

Any responsible enterprise should consider the potential environmental impacts of daily business decision-making processes along with opportunities for conservation of natural resources, source reduction, material recycling, and pollution control to ensure cleaner air and water and the reduction of landfill wastes. Sonoco Metal Packaging EMEA requires its suppliers to conduct business in accordance with all applicable environmental laws and highly recommends that its suppliers adopt sustainable practices in the conduct of their operations so as to conserve natural resources and minimize their environmental impact.



As a signatory of the United Nations Global Compact, Sonoco Metal Packaging EMEA commits to promote good working conditions, respect for the environment and ethics throughout its value chain. Sonoco Metal Packaging EMEA requires its suppliers, service providers, contractors and subcontractors to comply with the sustainability principles set forth in the United Nations Global Compact Program.

Sonoco Metal Packaging EMEA will rate their main suppliers according to their sustainability performance based on:

- Available annual comprehensive reports such as Environment Social and Governance Report or Sustainability Report;
- Ambitious goals for climate protection in line with Climate Agreement of Paris;
- Yearly evolution of climate protection goals;
- SEDEX (or equivalent) Registered for ethic Third Party Audit;
- CDP (Carbone Disclosure Project or equivalent) rating for Green House Gaz Reduction Program third party audit;
- ECOVADIS (or equivalent) score for full sustainability organisation and objectives third party audit;
- Recycling goals and engagement;
- Recycling rate or recycled content, as applicable.

Business Integrity and Anticorruption

In support of Sonoco Metal Packaging EMEA's values of ethics, morality, honesty and decency in its work, Sonoco Metal Packaging EMEA requires the following of its suppliers:

Antitrust/Competition Law Compliance - Suppliers will fully comply with the antitrust and competition laws of the countries in which they do business. For example, suppliers will not engage in collusive bidding, price fixing, price discrimination or any other unfair trade practices in violation of applicable antitrust and competition laws.

Anti-Bribery/Anti-Corruption - No Sonoco Metal Packaging EMEA employee or supplier or other third party acting on behalf of Sonoco Metal Packaging EMEA may pay, offer or promise to pay, or authorize payment to any party, public or private, in any country, in order to secure an improper benefit for Sonoco Metal Packaging EMEA. Nor may they accept, demand, request or solicit such payment. Suppliers shall not make, offer, request, or accept any improper payment to or from Sonoco Metal Packaging EMEA personnel or otherwise in connection with business related to Sonoco Metal Packaging EMEA. Reasonable, noncash gifts having a token or nominal (modest) value, as well as reasonable meals and entertainment for legitimate business purposes, are acceptable provided they are not intended and cannot be construed as bribes, kickbacks or other forms of compensation to the Sonoco Metal Packaging EMEA recipient. The giving to any Sonoco Metal Packaging EMEA personnel of any cash gift (including cash equivalents such as gift cards, stocks or bonds) or any personal loan is strictly prohibited regardless of value.



Conflicts of Interest

Sonoco Metal Packaging EMEA's personnel are expected to act always in the best interest of Sonoco Metal Packaging EMEA and to avoid any actual, potential or perceived personal, business or other conflicts of interest. Sonoco Metal Packaging EMEA expects its suppliers to support this requirement by immediately reporting to Sonoco Metal Packaging EMEA any actual, potential or perceived conflict of interest that may arise in our relationship.

Confidentiality

Suppliers who receive information from or on behalf of Sonoco Metal Packaging EMEA on a confidential basis shall maintain that confidentiality and shall use the information only in the performance of their obligations to Sonoco Metal Packaging EMEA.

Intellectual Property Protection

Suppliers shall respect the intellectual property rights of Sonoco Metal Packaging EMEA and others and comply with their legal and contractual obligations to Sonoco Metal Packaging EMEA with respect to the protection of all intellectual property provided to them by or on behalf of Sonoco Metal Packaging EMEA.

International Trade

Supplier confirms that neither it nor any of its shareholders, beneficial owners, directors or executive management are listed as Designated Persons or Specially Designated Nationals, by any of the EU, UK or US, and are not located or resident in jurisdictions subject to comprehensive sanctions (including Syria, Iran, North Korea, Crimea and Cuba).

Suppliers shall assist Sonoco Metal Packaging EMEA by complying with all trade laws applicable to Sonoco Metal Packaging EMEA in the performance of their obligations. Those trade laws include EU and U.S. trade sanctions laws, export controls laws, import laws and laws regarding supply chain security and sustainability, including laws related to the origin of goods or services that suppliers provide to Sonoco Metal Packaging EMEA and laws relating to human rights ("**International Trade Laws**").

Supplier confirms that it will not do anything or otherwise cause Sonoco Metal Packaging EMEA to be exposed to any potential sanctions or penalties for non-compliance with International Trade Laws.

Data Protection

Suppliers shall respect privacy rights and comply with all applicable laws relating to data protection and data security.

Origin Mapping

Suppliers must be capable of disclosing potential sources of primary origin associated with the products or services provided to Sonoco Metal Packaging EMEA. If requested by Sonoco Metal



Packaging EMEA, suppliers will provide supply chain mapping back to the origin. This obligation applies to, for example, certain conflict minerals. Sonoco Metal Packaging EMEA expects suppliers to advise Sonoco Metal Packaging EMEA if their products contain conflict minerals, or if for any other reason the origin of a product may cause Sonoco Metal Packaging EMEA to violate EU, U.S., or other laws applicable to Sonoco Metal Packaging EMEA.

Financial Controls

Suppliers shall maintain strong financial controls and keep complete and accurate records of all business operations and transactions involving Sonoco Metal Packaging EMEA in accordance with applicable retention policies and laws. Participation in money laundering or the financing of terrorists or criminal activities in any way is strictly prohibited. Sonoco Metal Packaging EMEA reserves the right to conduct a financial audit, or to otherwise review supplier books, records, and controls related to Sonoco Metal Packaging EMEA, to assess supplier's compliance with this Supplier Code and other obligations supplier has to Sonoco Metal Packaging EMEA, and the supplier will cooperate with Sonoco Metal Packaging EMEA in this process.

Continuous Improvement

Striving for excellence and continuous improvement is an important facet of how Sonoco Metal Packaging EMEA conducts business. Sonoco Metal Packaging EMEA encourages and recommends suppliers to:

- Continuously improve their products and/or services so as to improve quality, reduce cost and minimize the impact of their products on the environment.
- Maintain accurate supply chain records.
- Identify, set targets and implement action plans for reducing environmental impacts in the areas of water, wastewater, energy, greenhouse gas emissions, waste, landfill use and packaging.
- Strive to reduce their environmental footprint, commit to continuous improvement on sustainability issues, and support the achievement of the goals of Sonoco Metal Packaging EMEA's sustainability program.
- Source raw materials from sustainable sources where compatible with the needs of Sonoco Metal Packaging EMEA's production processes.

Accountability and Compliance

Sonoco Metal Packaging EMEA recommends that suppliers implement appropriate policies, management systems, procedures and staffing to meet the expectations of this Supplier Code. Sonoco Metal Packaging EMEA expects suppliers to effectively communicate to personnel the standards to which the supplier is committed, as well as relevant laws, regulations and protections.

Sonoco Metal Packaging EMEA reserves the right to require proof of compliance with this Supplier Code (or the equivalent provision of a supplier's code of conduct), which Sonoco Metal Packaging EMEA may require in the form of a certification of compliance, a review of



the supplier's supporting documentation and records or other appropriate evaluative format. If the supplier is not in compliance, Sonoco Metal Packaging EMEA reserves the right to review the non-compliance with the supplier and require the supplier to take corrective measures to cause compliance. Sonoco Metal Packaging EMEA reserves the right to terminate the supplier relationship with immediate effect in respect of any non-compliance by the supplier with the provisions in this Supplier Code relating to "Business Integrity and Anticorruption" and "International Trade". Sonoco Metal Packaging EMEA may also require suppliers to attend training on compliance with this Supplier Code and/or laws applicable to the supplier in conducting business on behalf of Sonoco Metal Packaging EMEA.

Nothing in this Supplier Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Supplier Code and any other provision of a particular contract, the contract provision will control.

REPORTING VIOLATIONS.

As further detailed in the Code, any supplier who becomes aware of any existing or potential violation of this Policy is strongly encouraged to report the concern to the Compliance Officer or the Legal Department. If you believe that you need to keep your concern confidential, you may also report your concern using the Ethics Reporting Hotline, as follows:

- Website: <https://report.syntrio.com/sonocometal>
- Anonymous Reporting App: Keyword: sonocometal
 - o Detailed instructions [here](#) [lighthouse-services.com]
- Toll-Free Telephone:
 - o 800-603-2869 (must dial country access code first [click here](#) [lighthouseservices.com] for access codes and dialing instructions)
- E-mail: <mailto:reports@lighthouse-services.com> (must include company name with report)
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- Fax: +1 (215) 689-3885 (must include company name 'sonocometal' with report)

Reported complaints and concerns will be communicated and investigated, as appropriate, in accordance with the Sonoco Metal Packaging EMEA compliance program. No one should report any existing or potential violation to any person who is involved in the matter giving rise to the existing or potential violation.

Every person who receives a complaint or a report alleging or regarding an actual or potential violation of the Code should encourage the person reporting it to communicate with the Compliance Officer or another member of the Legal Department. The person receiving the complaint or report may also communicate with the Compliance Officer or Legal Department if needed.



Anonymous Reporting

When using the Ethics Reporting Hotline, the complainant may remain anonymous. However, we encourage anyone making a report to identify themselves to facilitate follow-up and investigation as, in some cases, anonymity may hinder a full investigation of the issue. The complaint should provide a sufficiently detailed description of the factual basis of the allegation so that an appropriate review can be performed.