



GROUP POLICY

GIFTS AND INVITATIONS ¹

According to the value **Respect for the law** of the **Code of Conduct** of Verallia:

“The Group companies apply the applicable laws and regulations in the countries where they operate their business, and refuse to take any deliberate advantage of local loopholes or inconsistencies to circumvent Verallia’s values.

In particular, ... They ban all forms of corruption. Group companies also refuse to participate in any form of funding for political parties or organisations.”.

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The purpose of this policy is to determine specific rules for giving and receiving Gifts. All Group Companies shall apply these rules.

Each General Manager is allowed to adopt specific principles or rules to apply to the company of which is his responsibility provided that these principles and rules are stricter than these of this Policy.

What is a Gift?

A *Gift* is an object offered for no payment, an offer of accommodation or a meal invitation, or any other Advantage² enjoyed by the beneficiary for free and which has a value (in cash or in kind). Giving a *Gift* must be a gesture of pure courtesy as part of normal business relations in accordance with the customs of the country where the *Gift* is made.

Gifts may only be accepted insofar as frequency is limited and their value token. The giving or receiving of Gifts must fall within a purely professional scope.

The maximum values can only be set by President of Verallia Group for each country where the Group is present taking into account the regulatory and economic local context and the standard of living of the relevant country.

Who is concerned?

This policy applies to all business *Gifts* given and/or received in the course of Group activities. It applies to *Gifts* which may be given to third-party external partners, such as customers, suppliers or service providers, and also to those received by employees of Group companies.

¹ Updating of the previous GIFT and INVITATION Policy of May 2016.

² “Advantage” can include in addition to a gift, any benefit, payment, service, loan, job offer, hospitality, contribution, donation, grant or sponsorship, and more generally anything of interest to the beneficiary (in cash or in kind).

What kind of risks are to be avoided?

This policy concerns avoiding risks of:

- creating a conflict of interests, for example when the value of the gift (monetary or otherwise) is such that the recipient may not act in sole consideration of the interests of his or her employer
 - obligating or influencing the beneficiary
 - damaging the image of the company and/or the Group.
- and, more generally, any bribery and trading in influence practices.

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Gifts given to a third party

This may concern for instance:

- 1 gift given on the occasion of a special event such as:
 - a traditional festivity, etc.
 - the achievement of a professional success,
 - the conclusion of a negotiation of a project /deal between the Group company and its business partner,
 - or promotional objects.

In any case,

- the value of the *Gifts* must be low;
- they cannot be included in an expense report; they must be purchased in compliance with applicable purchasing procedures;
- they must be distributed according to objective criteria;
- the giving of *Gifts* must be limited to persons directly involved in a business relationship with the company.

The giving of any *Gift* beyond the rules set here above shall require prior authorization from the Department Director of the employee's company.

- 2 invitations to events such as:
 - . business meals,
 - . site tours,
 - . sporting or cultural events,
 - . trade events (fairs, exhibitions, trainings, etc.).

In any case,

- these invitations must always be justified on professional grounds and be part of normal business relations;
- the payment of accommodation or travel expenses on behalf of a third party (customers or others) may only be made if related to a clearly identified operation, such as a site tour, training course, etc. and limited to the duration of the operation;
- the amounts involved must remain within the limits established by the President of Verallia Group;
- they must not be aimed at or result in the recipient being obligated to the gift-giver or influenced.

These rules do not concern the invitations which are made within the framework of communication events organized collectively for all customers on specific occasions (launch of a new product, inauguration of a site, etc.) and included in the budgets of the Communication/Marketing Department. This kind of invitations must be addressed to the general manager of the Customer or Supplier company which will indicate the person who will participating on its behalf.

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In any case, the giving of *Gifts* or invitations to elected representatives, public authorities or administration agents or other government officials, may only be considered following the prior written express consent of the Verallia Group Department Director and the Verallia Group Legal Director.

Giving sums of money or equivalent benefits are prohibited.

Any request for *Gifts* sent to a Group employee by a person with whom they are in a business relationship must be immediately brought to the company's General Manager and the Verallia Group Legal Director attention.

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Gifts received from a third-party

- The ***Gifts*** are only acceptable if low in value and received by the employee at the professional address;
- No ***Gift*** from potential suppliers or service providers/agents is acceptable, if a request for proposal is about to be or has been launched or is being negotiated;
- The ***Gifts*** received should in general, be pooled and shared between members of the department or service concerned or given to a charity;
- Acceptance of invitation to sporting, cultural or other events is only acceptable by an employee if justified by a specific business interest for the company and if authorized in writing beforehand by his/her Department Director.

It is strictly forbidden for any Group employee to ask in any way whatsoever for a *Gift* or other favor from a business partner, whoever this may be.

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