

## VERALLIA'S VALUES



Verallia has adopted a Code of Conduct reaffirming the principles that have been guiding all its entities and teams for a long time.

All Verallia employees must respect these values. They must know and comply with the Code as well as other Group Policies, including the Group's Compliance Program.

## VERALLIA'S 4 VALUES ARE:

- Care for Customers
- Respect people, laws and the environment
- Empowerment and accountability
- Teamwork

## OBJECTIVES



The entities of the Group apply the laws and regulations in force in the countries where they operate. They must not deliberately take advantage of local legal loopholes or deficiencies and deviate from Verallia's values.

In particular, every form of corruption is condemned.

In this context, the Group has implemented a **dedicated Whistleblowing System** to raise alerts. This System allows you to raise alerts in a **confidential** manner.

## WHAT SHOULD BE REPORTED?



The Whistleblowing System refers to all measures implemented in order to allow Verallia Employees to report facts relating to the violations of the Code of Conduct and to Verallia's Anti-Corruption and Anti-Trading in Influence Policy, in particular acts of corruption or influence peddling, crimes or offences, as defined in the **Whistleblowing System Policy<sup>1</sup>**.

As an example, alerts can be related to the following subjects: corruption, anti-competitive practices, discrimination, fraud, workplace harassment.

Alerts can lead to investigations and may thus **have an impact on other employees and/or on third parties**.

## WHO CAN RAISE AN ALERT?



**All Verallia Collaborators**, regardless of their position (management or member of staff), such as an employee (fixed-term contract and permanent contract), a trainee, an intern, an external and/or occasional employee (temporary employee, consultant, service provider, auditor, agent), including collaborators operating outside of the sites of the Group.

**The Whistleblower must have personal knowledge of the facts reported, act in good faith and in a disinterested manner.**

Collaborators can choose in which language they raise an Alert.

Whistleblowers are advised to provide the facts, information and documents to support their Alert, regardless of their format. Reports can include:

- The reason for raising the Alert
- The identity of the persons subject to the Alert
- Each document considered necessary to support the Alert.

## HOW TO RAISE AN ALERT?



Two channels for raising alerts are available to Employees.

- **The hierarchical channel:** The Alert can be reported to the direct or indirect line manager of the employing Verallia entity or to the point of contact designated by the Verallia entity and/or by sending a letter to Verallia Packaging SAS – Tour Carpe Diem – 31, Place des Corolles – 92400 Courbevoie (France) for the attention of the Secretary General
- **The Whistleblowing Platform:** The alert can also be made by using the Whistleblowing Platform (Whispli) available at the following link: <https://app.whispli.com/Ethics-Verallia>

Each Collaborators must feel free to discuss about the ways to raise an Alert as well as its content.

Any question related to the interpretation of the scope of the Whistleblowing System can be discussed **with the Head of Human Resources and/or the Compliance Officer of the Entity.**

## CONFIDENTIALITY AND ANONYMITY



The identity of the Whistleblower and of the persons targeted by the Alert remains **confidential** throughout its treatment, in accordance with applicable laws and regulations.

**Verallia encourages the Whistleblowers to disclose their identity.** In any case, the identity will be treated in a strictly confidential manner.

By way of exception, if the seriousness of the facts is established and the facts are sufficiently detailed, Alerts can be made anonymously. However, anonymous reports are not encouraged and do not allow an efficient processing of the Alert.

## PROTECTION AGAINST RETALIATION



Verallia is **committed to a non-retaliation policy**; as such, no retaliatory measures will be taken against a Whistleblower who raised an Alert in good faith. Verallia does not tolerate any form of retaliation against the Whistleblower, such as harassment. **Disciplinary measures or sanctions can be taken against the author(s) of retaliatory actions.**

## MANAGEMENT OF ALERTS



Regardless of the channel used to raise an Alert (hierarchical channel or Whistleblowing Platform), all Alerts are recorded on the Platform.

Each Alert is subject to a preliminary analysis and treated in a confidential manner, to determine whether the Alert falls within the scope of section 2.2 "What should be reported?". If the Alert does not fall within the scope of section 2.2, the Whistleblower will be notified and guided towards the appropriate channels.

## PROTECTION OF PERSONAL DATA



Verallia is committed to only process data that are adequate, relevant and not excessive in relation to the purposes for which they have been collected.

Personal data are stored in accordance with applicable local regulations as well as Verallia's rules and procedures for the protection and retention of personal data.

Any person identified during the treatment of an Alert, whether the Whistleblower or a person subject to an Alert, has the right to access his/her personal data and to request to correct or delete personal information, if it is incorrect, incomplete, ambiguous or outdated. However, if provisional measures are necessary to prevent the destruction of evidence related to the Alert, the person subject to the Alert is only informed after these measures have been taken.

**It should however be noted that the person subject to an Alert can under no circumstances obtain information regarding the identity of the Whistleblower, based on the right to access personal data.**

## HOW TO USE THE WHISTLEBLOWING PLATFORM?



The Alert can also be made by **all Verallia Collaborators using the Whistleblowing Platform (Whispli) available at the following link:**

<https://app.whispli.com/Ethics/Verallia>

The Alert will be triggered once the form is validated.

