

RESPONSIBLE PURCHASING POLICY

Our purpose

“RE-IMAGINE
GLASS FOR A
SUSTAINABLE
FUTURE”

A word from the sponsors

For several years, the **Verallia Group** has chosen to integrate Corporate Social Responsibility (CSR) into its global strategy, as a lever for improving its activities and results.

As a major player in the industry, we are aware of the impact of our activities and the significant role we have to play for the whole of society and the evolution of consumer habits. This is why our purpose “**re-imagine glass for a sustainable future**” is fully in line with this approach.

It is based on four major axes:

- Strengthen the circularity of glass packaging
- Decarbonize our activities
- Ensure a safe and inclusive working environment for all
- Apply the highest standards of business ethics to customers, suppliers, employees and communities

The development of Verallia’s **Code of Conduct** and membership in the United Nations Global Compact are strong signs of our determination to reconcile economic performance with respect for our values.

We know that we will not be able to fulfill these commitments and achieve our goals without mobilizing all of the company’s strengths, as well as those of our suppliers, who play a key role. Purchasing is therefore at the heart of the system: our teams are committed to building and guaranteeing the conditions for a lasting partnership with suppliers, in order to encourage changes in their operating methods and promote innovation.

It is in this context that Verallia’s Responsible Purchasing policy has been developed. It presents the main principles, aimed at bringing together all of our stakeholders around this approach.

We hope you enjoy reading it,

Wendy Kool Foulon, Group CSR Director & General Counsel
Laëtitia Fabre, Sustainability Director,
Jérôme Crest, Purchasing Director
Romain Barral, Operations Director

Verallia's Purchasing principles

Verallia and its Purchasing Department implement **3 FUNDAMENTAL PRINCIPLES** throughout their operations:

1

ENSURE COMPLIANCE WITH THE VALUES of the Verallia Group by the internal and external stakeholders in their purchasing activities

2

CO-CONSTRUCT SUSTAINABLE RELATIONSHIPS with our suppliers and encourage innovation in support of our global CSR strategy

3

MOBILIZE AND DEVELOP INTERNAL STAKEHOLDERS in the purchasing process in a responsible purchasing approach

1

Ensure compliance with the values of the Verallia Group by internal and external stakeholders in their purchasing activities

APPLY THE HIGHEST STANDARDS OF BUSINESS ETHICS

Compliance with laws, regulations and business ethics are central to the values of the Verallia Group. All of these principles are set out in Verallia's Code of Ethics. Each employee is committed to respecting the following pillars:

Fight against corruption⁽¹⁾

Compliance with competition law⁽²⁾

Compliance with the rules on economic sanctions⁽³⁾

Compliance with data privacy⁽⁴⁾

Protection of data and information systems⁽⁵⁾



Each employee benefits from the Group's support with the sharing of policies and online training, including operational objectives to be achieved. Training includes compliance (corruption, competition, embargoes) and adherence to Group values.

(1) Anti-bribery and anti-influence policy, whistleblower policy, conflicts of interest policy, gifts and hospitality policy, due diligence procedure for third parties, agents and intermediaries' policy, donations and sponsorship policy,
(2) Guide to compliance with competition law and Professional Associations policy
(3) Policy on compliance with rules relating to economic sanctions and embargoes
(4) General procedure for personal data, procedure for exercising the rights of individuals, procedure for notifying violations of personal data
(5) Information security policy.

BE A PLAYER IN VERALLIA'S ENVIRONMENTAL STRATEGY

Each employee contributes directly or indirectly to purchasing. Therefore, each employee has a part to play in the Verallia Group's environmental strategy, by defining and choosing partners in line with the Group's commitments in this area.

Purchasing circularity

The circular economy is a major focus of Verallia's environmental strategy. The Group is committed to reducing the environmental impact of its activities and favors the use of recycled materials. This is the case in many areas, such as packaging and raw materials, with the increasing use of external cullet, a key link in the glass industry's circular chain. The Verallia Group aims to reach a rate of 59% use of external cullet in its production worldwide by 2025 and 66% by 2030. Employees are encouraged to mobilize suppliers to place their activities in a circular model, conserving and using natural resources responsibly.

Technological changes in glass furnaces

The Verallia Group's operations are heavily involved in the development of new glass manufacturing processes that are both less energy intensive and based on a higher consumption of electricity than fossil fuels. Purchasing is a strategic stakeholder in identifying suppliers and establishing the partnerships that are essential for the implementation of these new technologies. The Group's objective is to reduce CO₂ emissions by 46% between 2019 and 2030. This implies a major mobilization of our external partners to support Verallia in this challenge.

Purchasing decarbonization

Verallia is committed to decarbonizing its supply chain. This involves mobilizing operational staff in conjunction with suppliers linked to the main indirect emission items, notably transport, raw materials and packaging. The challenge for the operational teams is to adopt an approach that integrates the analysis of environmental impacts and in particular the CO₂ emissions of the various items. In particular, these teams are the relays for suppliers, in order to collect reliable data that can be used to set up a plan to reduce CO₂ emissions

Preservation of ecosystems

Through its actions, the Group is committed to reforestation and the preservation of natural ecosystems. The objective is to regenerate ecosystems and support small producers, farmers, foresters and agricultural organizations in order to promote the conservation and

restoration of natural resources and biodiversity. These actions are carried out throughout the Group's activities. Verallia is also committed to engaging suppliers to reduce the impact of their activities on fauna and flora and preventing any accidental degradation of their environment.

ACT WITH INTEGRITY WITH REGARD TO HUMAN RIGHTS, FUNDAMENTAL FREEDOMS AND WORKING CONDITIONS

Compliance with the eight fundamental conventions of the International Labor Organization and the Universal Declaration of Human Rights is a requirement for the Verallia Group in its operations and with its purchasers and partners. Employees, and more specifically purchasers, must ensure that suppliers comply with these international conventions throughout their subcontracting chain. This implies a ban on the use of forced labor, child labor, any form of discrimination, either directly or indirectly, or through subcontractors in the context of their work on the Group's facilities.

Decent pay for our suppliers' employees and financial compensation for overtime

Verallia is committed to working with suppliers to define the terms and conditions of overtime pay in connection with the Group's operations. Employees must ensure that suppliers guarantee the payment of decent and equitable compensation to employees that ensures a decent standard of living above the poverty line. Wages, including overtime and benefits, must not fall below the level required by applicable laws and regulations.

Ensuring a safe working environment

The Group has developed a health and safety management system based on the industrial processes used at Verallia sites that can expose employees and service providers working on site to accidental events that could have consequences for their health or safety (musculoskeletal disorders, etc.). In the same way as Verallia employees, suppliers are subject to the principles of safety at work on their sites and ours. The company has set ambitious objectives in terms of health and safety at work by including all employees involved in the production chain, whether they are internal or external to Verallia.

The Group has high standards for its suppliers in terms of health and safety, which it has set out in a Supplier Charter and which it monitors through its evaluation process.

MOBILIZING RESPONSIBLE PURCHASING TO SUPPORT VERALLIA'S COMMITMENT TO DIVERSITY AND INCLUSION

Developing and building an inclusive work environment in manufacturing is a major challenge for the glass industry. The Group's aim is to open up and make its jobs accessible to as many people as possible, through direct recruitment and also through its partners.

Promoting diversity in management and industry

Verallia fully affirms its desire to value and develop the share of women within the company. Operations and purchasing are particularly attentive to the development of diversity, especially gender parity within the management bodies of suppliers.

Inclusion and retention of people with disabilities in the workplace

The Group is committed to making diversity an asset by facilitating the return to or access to employment for people with disabilities. The company is developing direct employment and ergonomic workstations in its plants, and is seeking to promote partnerships with companies that encourage the employment of disabled people.



2

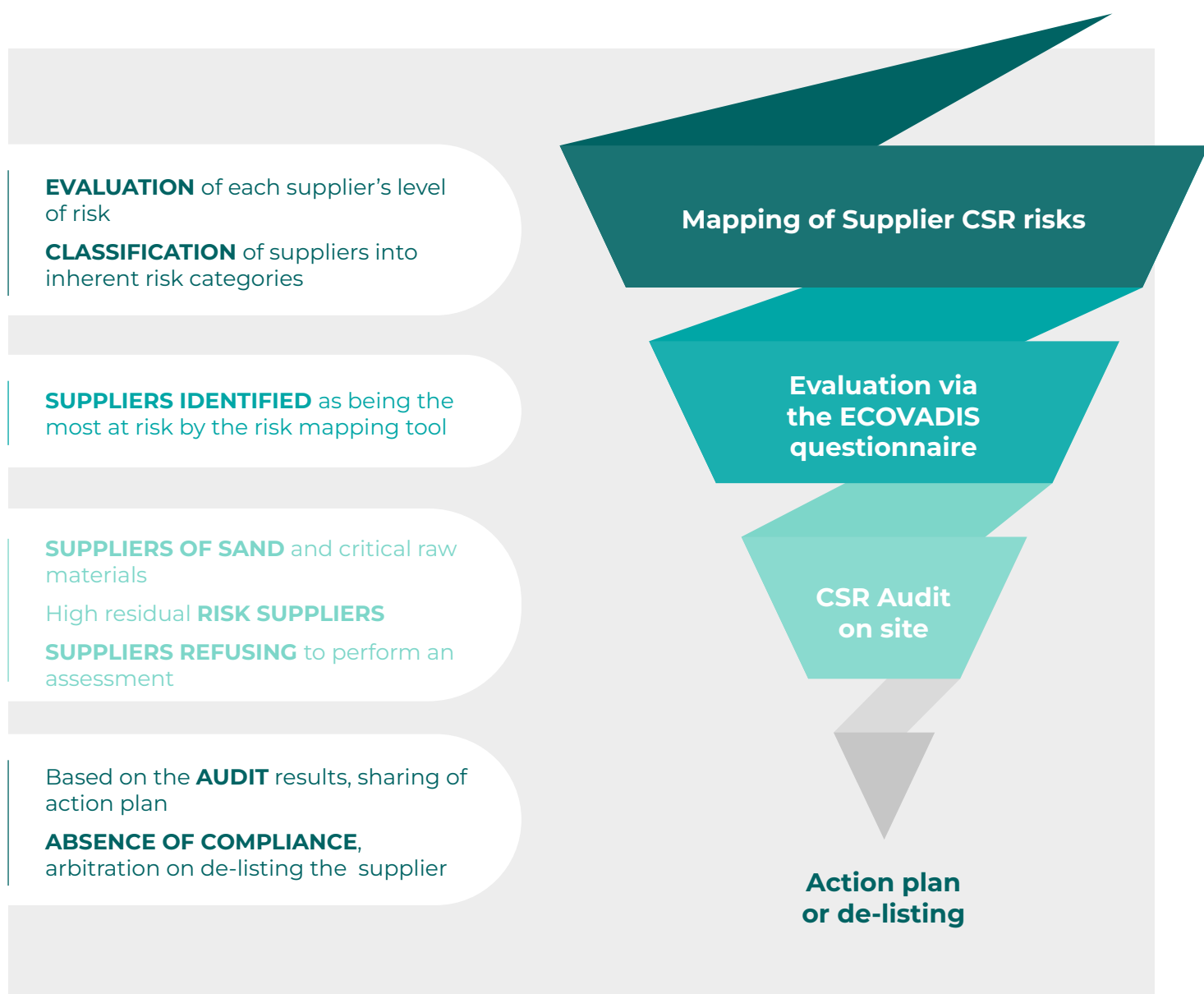
Co-construct sustainable relationships with our suppliers and encourage innovation in support of the company's global CSR strategy

Verallia's Responsible Purchasing approach is part of an overall corporate framework and stems from the Group's CSR strategy. It focuses on the following areas: Organization & Training, Purchasing Processes, Evaluation & Risk Management:



The Group wishes to raise supplier awareness as early as the tender process. In fact, signing the Supplier Charter is a mandatory step for participation in this process.

VERALLIA'S PURCHASING DEPARTMENT HAS DEVELOPED A SUPPLY CHAIN RISK MANAGEMENT PROCESS to identify, anticipate, manage and mitigate risks. This system aims to select suppliers that are in line with Verallia's principles and to fully commit them to the Group's CSR approach.



The document «Procedure: Sustainable Purchasing Organization & Processes» provides more details on the Verallia Group's Responsible Purchasing approach and the processes in place.



VERALLIA'S COMMITMENT WITH REGARD TO CONFLICT MINERALS

Verallia is committed to not using minerals originating from countries in conflict. This designation concerns minerals from conflict zones or high-risk areas, including gold, tin, tantalum and tungsten.

To do this, Verallia has integrated the five steps of the OECD* on due diligence for responsible supply chains of minerals from conflict or high-risk areas, namely:

1. The establishment of a solid management system
2. Identification and assessment of supply chain risks
3. Designing and implementing a strategy to address the identified risks
4. Conducting an independent third party audit
5. The preparation of a report on the exercise of due diligence (Conflict Minerals Risk related** minerals annual campaign report and conclusion)

Suppliers are identified and are subject to specific monitoring, particularly with regard to the risk assessment process, and to an appropriate monitoring system in line with the issue and the risk represented by the supply.

3 Mobilize and develop internal stakeholders in the purchasing process in a Responsible Purchasing approach

GOVERNANCE

Verallia's Responsible Purchasing governance consists of a specific function within the Group Purchasing Department and is integrated into the Verallia ecosystem as follows:

Group Operations Director Member of the Executive Committee	Ensures consistency between Verallia's purpose, strategic priorities, the CO ₂ roadmap and the Responsible Purchasing policy.
Group Purchasing Director	Defines the Group's purchasing strategy; Defines objectives and monitors their achievement.
CSR Risk Committee. This committee includes several members of the Executive Committee (the Group Operations Director, the Group Human Resources Director, the Group CSR Director and General Counsel), as well as the Group Purchasing Director and the Group Responsible Purchasing and Supplier Quality Manager)	Reviews objectives, status and findings of assessment campaigns, e.g., conflict minerals risk assessments; Follows up on suppliers that do not comply with Verallia's requests; Designs and implements a strategy to address identified risks.
Group Responsible Purchasing and Supplier Quality Manager	Structure and lead the Responsible Purchasing approach; Coordinate the team of Responsible Purchasing correspondents; Design and deploy training courses..
Central purchasing category Directors / Managers	Set the strategy and coordinate the purchasing approach for the segments considered in connection with the regions/ countries; Negotiate directly with international suppliers
Division Purchasing Director	Pools purchasing at the country and geographical area level; Steers purchasing at the local level.
11 country Responsible Purchasing correspondents	Follow the objectives and action plans.
90 purchasers	Manage purchasing segments at the local level.

*This conflict minerals procedure is detailed in the document «Procedure: Conflict Minerals Risk Procedure».

** Annual Report and Conclusion on Conflict Minerals Risk

Each employee can be an actor and/or specifier of a purchase. The purpose of this Responsible Purchasing policy is to translate Verallia's commitments in the act of purchasing for each employee involved in relations with suppliers.

COMMITMENT OF THE INTERNAL STAKEHOLDERS IN THE PURCHASING ACT

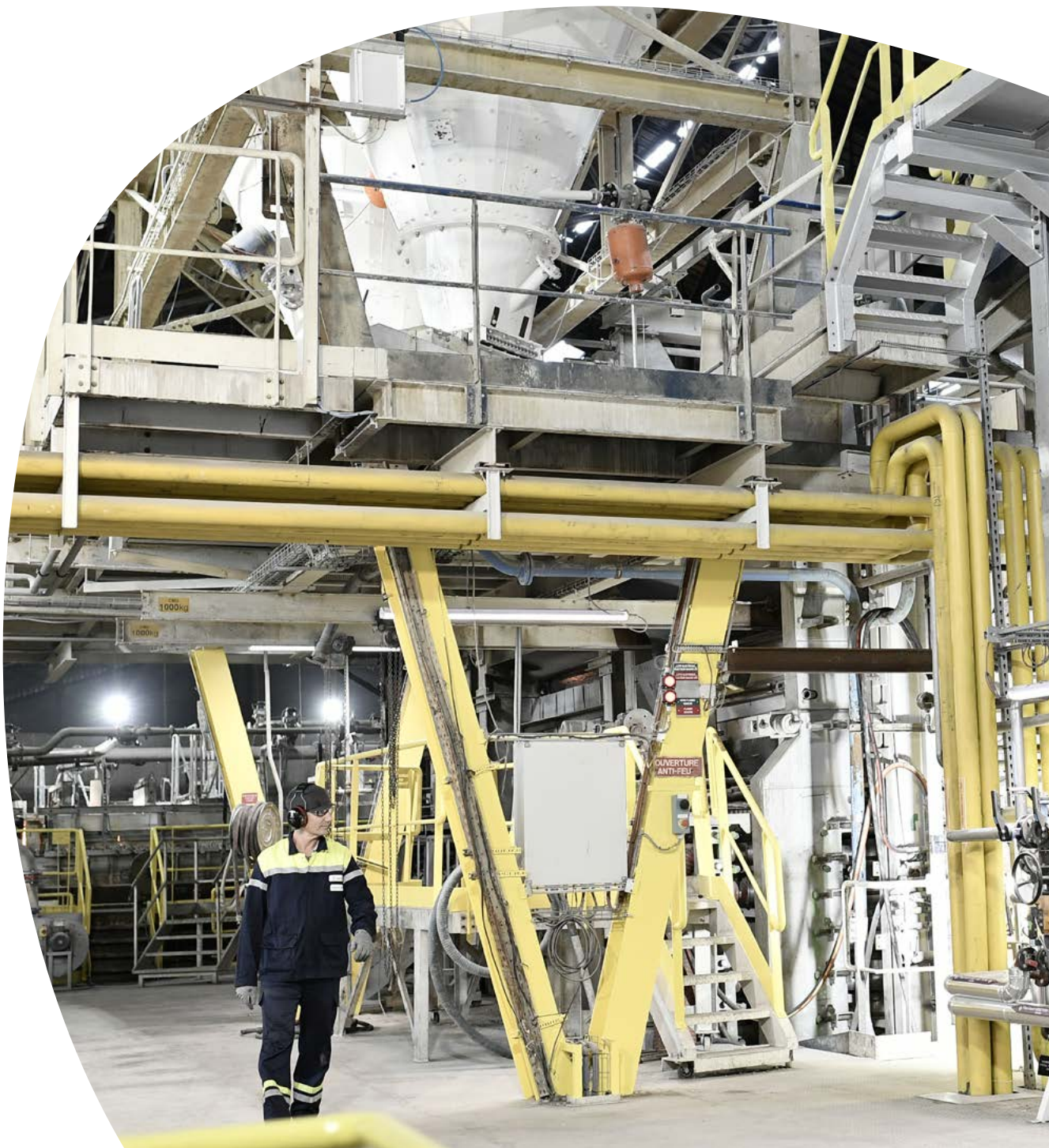
Verallia's purchasing policy applies to all employees who work with the Group's external partners.

Employees are committed to acting ethically and with integrity with suppliers, including in the event of a dispute, in accordance with the Group's Code of Conduct.

All employees must be transparent with their superiors regarding any gifts and invitations received and/or given. If in doubt about customs and practices, employees should refer to Verallia's gifts and hospitality policy.

In addition to the general training courses defined by the Group, purchasers receive additional training that provides them with fundamental knowledge of the CSR challenges of the Verallia supply chain and responsible purchasing. All purchasing teams receive training via the network of Responsible Purchasing correspondents on the approach and tools in place.

Each employee of the Verallia Group must have a good knowledge of the Verallia supplier charter in order to be able to present it to suppliers. It formalizes the Group's sustainability requirements for suppliers and Verallia's reciprocal commitments to its suppliers. It is supplemented internally by a Supplier Relations Charter for purchasers and any employee in contact with a Verallia supplier.



CONTACTS

If you have any questions, please contact the **Verallia Responsible Purchasing team** at the following address:



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REFERENCE DOCUMENTS



www.verallia.com

Ethics and Compliance Section
Regulated Information Section
Sustainability Section

UN Global Compact:
www.unglobalcompact.org

UN SDG:
sdgs.un.org/goals

Universal Declaration of Human Rights:
www.un.org

UN Guiding Principles on Business and Human Rights:
<https://www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/>

OECD Guide on Due Diligence for Responsible Supply Chains of Minerals from Conflict and High Risk Areas:
<https://www.oecd.org/corporate/mne/mining.htm>

8 fundamental conventions of the ILO (International Labour Organization):
www.ilo.org