

# SUPPLIER CODE OF CONDUCT

### PURPOSE

Intelligent Packaging Limited Partnership and its subsidiaries (collectively referred to as, "**IPL**" and the "**Company**") are committed to the highest standards of business and ethical behaviour, to fulfilling our responsibilities to the communities which we serve and to the creation of long-term value for all stakeholders on a socially and environmentally sustainable basis. We are committed to the responsible sourcing of goods and services and this Supplier Code of Conduct sets out our expectations of those who provide these goods and services to the Company.

The purpose of this Supplier Code of Conduct Policy (the "**Policy**") is to implement a consistent groupwide approach setting out minimum standards expected from suppliers. The term 'Supplier(s)' as used in this code refers to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who work with the Company.

# <u>SCOPE</u>

Suppliers shall apply these requirements to their own suppliers, contract providers, and approved subcontractors who supply goods and services to the Company.

This Policy is informed by a number of international standards and guidance documents, including the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, the Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, the Children's Rights and Business Principles and the Convention on the Elimination of Discrimination Against Women.

The Company conducts its business in a transparent, honest and responsible way and we expect our Suppliers to do the same. The Company reserves the right to audit or inspect Suppliers' records and facilities, as applicable and permitted by law. We expect Suppliers to treat all employees fairly and with respect, in full compliance with the following requirements:

## Child Labour

- Suppliers shall not permit the use of child labour.
- No child below the age for finishing compulsory schooling, or 15 years of age (whichever is the greater) may be employed by a Supplier, subject to ILO exceptions.
- Where young people under the age of 18 are employed, Suppliers will ensure that their work is not likely to be harmful to their health and/or development.
- Ensuring compliance with all applicable laws.

## **Forced Labour**

- Suppliers shall not permit the use of forced or involuntary labour of any type, this includes forced, trafficked, bonded, indentured or involuntary prison labour.
- Workers shall be free to leave employment without penalty on the provision of appropriate notice.
- No fees or related costs are charged to applicants and workers for recruitment and that no monetary deposits, financial or collateral guarantees or personal possessions are required as a condition of employment.
- No restriction of worker's freedom of movement.

#### **Migrant Workers**

• All employees have the legal right to work, and any migrant workers are in possession of a valid work permit.



• Appropriate measures are in place to protect migrant employees against any form of discrimination.

### Freedom of Association and Collective Bargaining

• Rights of employees of freedom of association and collective bargaining are respected.

### **Discrimination / Fair Treatment**

• No discrimination in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class.

#### Wages

- Workers are informed about their employment terms and conditions in writing and are communicated to them clearly before the workers enter into employment.
- Communication is in line with applicable law.
- Compensation complies with all applicable wage and hour laws, and/or industry standards approved on the basis of collective bargaining, whichever is higher.
- Deductions to wages shall only be made in accordance with applicable law or under collective agreement.
- Workers will be provided with clear and written details of their wages each time they are paid.

## **Working Hours**

- Working hours that comply with national laws and industry standards.
- Regular hours worked shall not typically exceed sixty hours per week (including overtime).
- Workers will be provided with at least one day off in every seven-day period.
- Overtime shall be voluntary and compensated at a premium rate.
- All overtime related practices will be conducted in accordance with applicable laws and regulatory standards.

#### **Occupational Health & Safety**

- All employees work within safe and humane conditions, this includes providing necessary training and appropriate protective equipment to safely carry out their tasks.
- Provision of access to clean toilet facilities, water and sanitary facilities for food storage.
- Facilities are in line with applicable laws and regulations.
- Accommodation, if provided, shall be clean, safe and meet the basic needs of workers while respecting their dignity.
- Appropriate exits, procedures and equipment are put in place to deal with emergency situations.

#### **Business Ethics**

- The Company does not tolerate bribery or corruption in any form, or any acts that contravene its Anti-Corruption Policy.
- The Company expects that Suppliers will not directly or indirectly promise, offer or provide any improper advantage to any person or entity, including officials of a government or a government-controlled entity.
- Maintenance of accurate records of Suppliers activities and performance that clearly demonstrate compliance with all applicable standards, regulations and Company requirements.
- Suppliers are required to disclose personal relationships and/or an economic interest to their business held by an employee or contractor within the Company.

## Environment

• Suppliers will comply with all applicable environmental laws and regulations, including those relating to waste disposal, pollution, discharges and air emissions.



- Suppliers are expected to employ best practices for sustainability and the environment.
- Suppliers will share information on their raw material sourcing practices upon request from the Company.

### COMPLIANCE

The Company requires Suppliers to ensure their operations comply with all applicable laws and regulations at a minimum and we expect that all Suppliers adhere to this Policy.

Where issues are identified through internal or external reporting by way of our Navex portal, whistle-blowers will be protected from any negative repercussions or reprisals.

#### REPORTING

In the event deficiencies are identified, the Supplier will take the steps necessary within an acceptable timeframe to correct any deficiency to the Company's satisfaction. Suppliers shall immediately report any concerns about compliance with legal requirements or any aspect of this Policy, to their designated point of contact in the Company or through our whistle-blowing procedure.

### **BREACH OF POLICY**

Where Suppliers are found to have contravened the requirements set out in this Policy, the Company reserves the right to terminate any associated agreement or business relationship.

### **QUESTIONS AND CONTACT**

Any questions or concerns regarding this Policy should be directed to the Company's Chief Risk Officer, PJ Browne via the 'Contact us' link on our website.

The Company reserves the right to delete, modify, amend, or terminate this Policy at any time, with or without prior notice.

## APPROVAL DATE: December 13, 2023