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Dear All,

Our successful evolution to a global market leader for innovative plastic and aluminium closures is made possible by our exacting quality standards, our spirit of innovation and our clear commitment to ethical business practices.

This Code of Conduct is not just designed to communicate those ethical business practices, but also to support you, our employees, as a valuable source of guidance on your actions and interactions. The members of the leadership team are fully committed to ethical business principles in their respective roles. We use the Code of Conduct as our benchmark and strive to embody all of the principles outlined here in our daily decisions.

We encourage all BERICAP managers to lead by example, and all employees to cultivate partnership-based relationships with external stakeholders. We expect you all to interact with your teams in accordance with this Code of Conduct. For that reason it is important to ensure that all BERICAP employees and temporary personnel have read, understood and comply with the Code of Conduct at all times.

The first and most important goal of the Code of Conduct is to build and maintain trust because trust is the foundation of good relationships between us all, as well as with customers, suppliers and all other business partners.

Please take the time to read this Code of Conduct and use it for guidance in your everyday activities, especially when you are facing tough decisions or business situations with ethical implications. If you are concerned about a person's behaviour or believe there may have been a breach of our Code of Conduct we encourage you to speak up and report it.

Together, we can continue to ensure BERICAP is a safe place where everyone feels encouraged to contribute their individual strengths and develop to their full potential.

Sincerely,

Alexander Krautkrämer

Christian Krautkrämer

Jörg Thiels

Alexander Krautkrämer, Christian Krautkrämer and Jörg Thiels





INTRODUCTION

As the worldwide expert for reliable closure solutions, we are constantly innovating products with functional benefits for our customers that deliver the best product experience to the user, from opening and dispensing to closing. We endeavour to design closures and caps with the best flow experience – always convenient, always safe and always in line with our values and quality standards.

We assume responsibility for the planet by combining product excellence with sustainability. We not only focus on improving the consumer convenience, safety, reliability, quality and recyclability of our closures – we also encourage our suppliers to do the same. In addition to our own efforts to reduce materials and develop alternative solutions, we are cooperating with a variety of market participants to achieve circular material flows.

With our global footprint and local presence we are close to our markets, guaranteeing fast deliveries, consistent quality and prompt technical support to regional and multinational customers. Our global positioning also enables us to promptly identify relevant trends and developments.

Based on our solution-oriented approach, we help our clients to overcome challenges in development and production. As their companions we endeavour to make things easier for them by providing forward-thinking, industry-leading solutions that are quickly, easily and cost-effectively integrated into their products.

We believe trustful partnerships are essential to success. With our customers as well as with each other at BERICAP – we work in a responsible, agile and collaborative way, with a focus on meeting reciprocal needs, answering questions and identifying potential challenges and opportunities.

People are our most valuable assets. We value and respect all cultures and mind-sets in our local markets. We encourage mutual respect and know-how sharing between our teams of all nationalities, encouraging them to collaborate on achieving our mission in line with the high standards of ethical conduct set out on the following pages.





THE CLOSURE COMPANY

BERICAP invents, develops, manufactures, markets and reliably supplies world-class, high value-added products, preferably with proprietary BERICAP technology. One of the group's highest priorities is to optimally meet customer requirements. BERICAP develops solutions to customer challenges reflecting the very highest of quality standards.



Product development

BERICAP engages in continuous research and development activities to improve the consumer convenience, safety, reliability, quality and recyclability of its closures. At our four Product Development Centres we are developing products that are precisely tailored to the requirements of the international markets. BERICAP provides itself with the flexibility to develop and test different solutions by manufacturing its injection moulds in house. The product development and testing activities include the exploration and usage of new sustainable and recyclable materials such as Post-Consumer Resins (PCR) as well as lightweight product designs. A perfect “design for recycling” example is the BERICAP Valve, the first 100% silicone-free valve – an innovation for which BERICAP received Packaging Europe’s Sustainability Award 2020 in the category of ‘Recyclable Packaging’.

Product quality and food safety

BERICAP is committed to supplying safe packaging to the beverage, food and industrial sectors. This is accomplished by ensuring hygienic conditions at the plants (each site is certified to a recognized food safety standard such as BRC, FSSC 22000 and FDA), and a team of trained and qualified employees. All products are manufactured in accordance with local laws and food safety standards, and in compliance with customer and regulatory requirements. The company continuously improves its food safety management system through own initiatives, reviews its objectives, listens to its customers, and sources suppliers that share the group’s commitment.

BERICAP’s objectives are to enhance our customers’ products and provide end-users with a safe and convenient consumer experience. Each BERICAP production site has a certified quality management system in place. The group achieves manufacturing excellence through the application of group-wide standards and best practices, and a commitment to continuous improvement. BERICAP’s product excellence is based on state-of-the-art production processes and its user-centric approach.

Asset and intellectual property protection

BERICAP respects the intellectual property rights of others and vigorously defends its own intellectual property rights. The company stringently protects all assets, property and resources, ensuring that they are only used for business purposes and activities. Trade secrets of BERICAP, its partners, suppliers and customers are always kept confidential. The company expects its employees to handle confidential information responsibly and prohibits the use of such information for non-business purposes. Information that is generated within the company, including information relating to product development, manufacturing data, costs, prices, sales, profits, markets and customers, is the property of BERICAP and will not be disclosed outside the group without proper authority unless there is a legal requirement to do so.





HUMAN RIGHTS AND EMPLOYEE PROTECTION

BERICAP believes that its employees are the most valuable asset and encourages them to work together as a team to meet group objectives. Promoting a culture of mutual respect and know-how sharing among all employees of all nationalities is one of the mainstays of BERICAP's success. The group strongly supports internationally recognised human rights and expects its business partners to do the same. When disciplinary action is necessary, BERICAP ensures that all employees are treated with dignity and expects its business partners to do the very same. All disciplinary measures are carried out in compliance with the relevant national and international standards and internationally recognised human rights.

Labour rights

BERICAP complies with all national and international labour laws, codes and conventions, and is committed to upholding the principles set out in the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization (ILO).

Employee working hours are in accordance with the applicable national laws, industry standards and the relevant ILO conventions. BERICAP does not tolerate any form of child labour or forced labour. All employees are paid at least the statutory minimum wage, or the minimum wage that is customary in the industry. Unlawful deductions from wages, particularly for disciplinary purposes, are prohibited. Wages are paid by the most practical means (cash, check, bank transfer) and a payroll salary is provided to employees at appropriate levels. The BERICAP Supplier Code of Conduct is a separate document defining the values, principles and business ethics that we believe in and which we expect our business partners to commit to.

Discrimination and harassment

BERICAP does not tolerate discrimination in the recruitment process or at the workplace, particularly discrimination based on sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation. Career development in the BERICAP group is based on personal ability and work performance. Decisions on recruitment, development or promotion are based purely on candidate performance, competence and potential in relation to the requirements of the position. Employees who believe to have suffered discrimination or harassment are encouraged to report it to their managers. Each incident will be investigated impartially, and violations of the non-discrimination policy will be punished with appropriate measures.

BERICAP provides a working environment free from harassment and bullying of any form. All forms of unwanted verbal, non-verbal or physical conduct, including mental harassment, abuse, humiliation or intimidation, or conduct of a sexual nature will not be tolerated. All employees are required to respect their colleagues' right to work in an environment free from bullying, harassment, discrimination and violence.

Diversity

Every BERICAP employee is treated with honesty, integrity, dignity, fairness and respect. The group's recruitment policy favours a broad range of cultures, beliefs and backgrounds reflecting the communities in which it operates and the customers it serves. The company values diversity and fosters a culture that allows every individual to achieve their full potential.





Health and safety

BERICAP ensures a safe, healthy and secure environment for all BERICAP employees, contractors and visitors at the manufacturing plants and office locations around the world. The group takes precautions to identify hazards and performs regular assessments to manage health and security risks in alignment with its goal of zero severe accidents. BERICAP always endeavours to achieve compliance with applicable legal and other requirements.

Security

BERICAP is committed to protecting the welfare of its employees, visitors and contractors, as well as the integrity of its materials, products and assets. This is accomplished by maintaining a qualified workforce that has been security vetted and complies with company security policies. The group's security strategy includes regular risk assessments of the surrounding area to determine the level of security required. All building entrances are monitored and controlled and sufficient lighting on site provides clear visibility in all areas. Any unusual activities such as tampering with or contamination of products, which constitute criminal offences, are reported to the authorities and prosecuted. BERICAP expects all employees and management personnel to comply with its security policy.



“We are committed to driving sustainable growth and continuous improvement through the implementation of our EHS Policy.”



SUSTAINABILITY AND SOCIAL RESPONSIBILITY

Contributing to the creation of a sustainable economy, as well as to the protection of the climate and the environment, is one of BERICAP's primary objectives. It is our responsibility to protect our planet by exploring new sustainable materials and to encourage our suppliers to do the same. BERICAP's strong commitment to sustainable closure designs and materials as well as investments into energy-efficient production equipment has already enabled a significant reduction in carbon emissions.



The environment

BERICAP strives to fully engage employees, contractors, suppliers, customers and all other business partners in our shared responsibility to protect the environment. BERICAP's goal is to reduce its carbon emissions which includes the reduction of direct and indirect GHG emissions by sourcing renewable energy and increasing production efficiency. BERICAP aims for products that can be used and recycled in a safe and environmentally responsible way in compliance with all local and international regulations. This is reflected in the high number of production sites with ISO 14001-certified management systems. The group works in compliance with the highest EHS standards by deployment of best practices throughout the BERICAP group and its global operations.

Sustainability and circular economy

The company is aware of the negative impacts of plastics on the environment and biodiversity as a result of littering and insufficient rubbish collection and recycling infrastructure in many regions. Nevertheless, giving up is not a solution because they constitute an important component of the range of materials used in modern society. Plastic packaging protects food and enables the transportation and hygienic storage of food and beverages, thereby preventing perishing. As a signee of the European Circular Plastics Alliance declaration, BERICAP supports the establishment of a recycling loop for bottles and closures in order to prevent plastics from ending up in oceans and natural habitats. The company leads the industry's developments to tethered caps which remain firmly attached to the bottle after opening and during use and thus comply with the EU Directive 2019/904 which will come into force as of July 2024. The use of these caps protects the environment by recycling them together with the bottles and avoiding pollution from loose caps.

BERICAP is additionally involved in the development of solutions that decouple plastics production from virgin fossil feedstocks such as post-consumer recycled resins (PCR). The company works in partnership with experts worldwide to promote recycling. In the area of product development BERICAP focuses on eco-friendly product design, material reduction, lightweighting and recyclable solutions. For example, it has developed PCR industrial closures made from recycled plastic for appropriate customer applications.





BUSINESS BEHAVIOUR

As a supplier to the beverage, food and various industrial sectors, BERICAP's products are part of many people's daily lives. Making a positive contribution to an open-minded, innovative and inclusive society is one of BERICAP's priorities. Another is to earn and retain the trust of customers and business partners by acting at all times with fairness, honesty and integrity.

Gifts, favours and entertainment

Employees are not allowed to accept or provide any gifts, entertainment or personal favours that could be construed as a bribe, kickback or payoff. This regulation does not only apply to employees, but to all persons performing functions for the company, such as sales agents, consultants, interns, freelancers, and all of their family members. Gifts include all items of value such as consumer goods, promotional materials, discounts or cash. The acceptance of benefits such as preferential treatment, services, job offers or invitations to events is also prohibited. BERICAP only approves the business courtesies of gifts, favours and entertainment if they are justified by a legitimate business purpose, consistent with local guidelines and in compliance with the applicable laws of the relevant jurisdiction. Any uncertainties should be approved by the local General Manager.

Lobbying and political contributions

BERICAP is a privately-owned group with a corporate structure ensuring the financial and political independence of all group companies in all situations. Regardless of this, BERICAP takes a clear position on many political issues, and it maintains a trust-based relationship with the authorities. BERICAP's political lobbying is centralized, open and transparent. The employees and management are required to comply with lobbying laws and to refrain from unfairly influencing governmental policy and legislation. All political contributions and lobbying activities must be approved in advance by the BERICAP Board of Directors.

Contractual obligations

BERICAP fulfils its contractual obligations. Employees with the authority to transact business on the company's behalf must ensure that transactions are on time and properly documented in accordance with applicable legal requirements and accounting standards. BERICAP expects employees not to enter into contractual obligations beyond the scope of their authority.

Conflicts of interest

Business transactions at BERICAP must always be conducted with the group's best interests in mind. Business opportunities that conflict with the company's interests are not to be exploited. The same applies to personal conflicts of interest involving relatives or other related parties. If a conflict of interest nevertheless arises it must be dealt with openly and transparently, and resolved in accordance with the law and BERICAP policies.



Media and stakeholder communications

Open dialogue is the basis for trust-based collaboration. BERICAP is committed to transparent information sharing with suppliers, customers or other business partners as well as media, regulators, governments and non-governmental organizations. Employees must be aware that they may be perceived as representatives of BERICAP. For that reason they are required to consider and protect the company's reputation when acting or commenting in public or on social media. It is prohibited to disclose confidential information to third parties or make it publicly available. BERICAP employees are expected not to engage in dialogue with the media without the prior approval of the relevant internal function holder.



LEGAL COMPLIANCE

BERICAP is aware that global success and a pioneering role come hand in hand with the assumption of social and economic responsibility. Compliance with the national laws in the countries where the BERICAP companies operate form the basis for the company's business success, and its ability to support its customers' commercial endeavours with its products.



General legal compliance

BERICAP strictly complies with all applicable laws in the countries where it has subsidiaries, branches, facilities and offices and any other business activities, and it expects employees to respect national and international legislation and industry codes of practice that are applicable to their work. Since BERICAP is a decentralized organization, each local company ensures that all employees are informed and aware of the laws that are relevant to their roles and countries. BERICAP is committed to free and fair global trade, and its activities in this context exceed national and international legislative requirements. In addition to general legal compliance, all BERICAP actions are based on generally accepted ethical values and principles, particularly integrity and human dignity.

Competition law compliance

BERICAP upholds the principles of fair competition and business integrity. Employees are expected to respect these principles, irrespective of whether they are established in writing, orally, or any other form. Protective competition laws, especially antitrust and other regulatory instruments, are to be complied with. Collusion with third parties or agreements with competitors on price fixing, trading terms, allocations of sales territories, or customers, as well as the abuse of market power, contradict the group's ethical values and are prohibited.

Prevention of bribery and corruption

The company has a zero tolerance policy on bribery and corruption, as well as unethical and unlawful conduct. Employees are required to ensure that no personal dependencies, obligations or commitments to customers, suppliers or other stakeholders arise. All business relationships with suppliers and customers are based on integrity. No employee of BERICAP may, in the course of their business activities, directly or indirectly demand, accept, offer or grant incentives or rewards from suppliers, customers or public officials that would be illegal or unethical.





COMPLIANCE WITH THE CODE OF CONDUCT

Every BERICAP employee is expected to respect this Code of Conduct. Incidents of non-compliance are taken very seriously and BERICAP will investigate all valid concerns. If someone suspects or experiences an incident of non-compliance they are encouraged to speak up. BERICAP follows a policy of non-retaliation; there are no consequences for whistle-blowers. In proven cases of non-compliance appropriate corrective measures will be taken, which may include disciplinary action or criminal prosecution.

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