

# HUMAN RIGHTS POLICY

2023

This document is part of Plastic Omnium's commitment to human rights and defines how our employees should interact with business partners, suppliers, communities, and other stakeholders. Respect for human rights is one of Plastic Omnium's core values and the purpose of this policy is to define the Group's commitment in this area.

This policy is public and is reviewed regularly.

## 1. Human rights commitments

Plastic Omnium supports the highest Human Rights standards in conducting its operations by belonging to globally recognized organizations and initiatives:

- a. United Nations Global Compact since 2003;
- b. United Nations Universal Declaration of Human Rights and its two complementary covenants;
- c. Fundamental Conventions of the International Labor Organisation (ILO);
- d. ILO Declaration on Fundamental Principles and Rights at Work;
- e. OECD Guidelines;
- f. United Nations Sustainable Development Goals (SDGs).

The **Code of Conduct** present the non-negotiable rules that the Group has set itself in terms of respect for Human Rights, fundamental freedoms, health and safety, the environment, competition, diversity, anti-discrimination, fraud, corruption, and influence peddling.

Plastic Omnium also publishes a **Compliance Plan** that applies to its own operations and to the entire value chain.

The **Supplier Charter** specifies how suppliers must comply with the Company's responsible purchasing approach.

Governance is organised to consider Human Rights issues and deals with them in dedicated committees. Employees are involved in these issues through training and actions.

## 2. Operational implementation

### a. Code of conduct

The Code of Conduct present the non-negotiable rules that the Group has set itself in terms of respect for Human Rights, fundamental freedoms, competition, health and safety, diversity, the environment, anti-discrimination, fraud, corruption and influence peddling. It also reminds the commitments required of its employees: protecting the Group's assets and image, guaranteeing product quality and safety, and complying with ethics rules and regulations. The Code of Conduct was formalised in 2003 and was last updated in 2018.

It contains two parts :

- Plastic Omnium's commitments and obligations to its employees;
- Employees' commitments and obligations to Plastic Omnium.

It formalises the **alert procedure** describing the **alert mechanism** set up in the Group.

The Code of Conduct is translated into the main languages in use within the Group, i.e. 22 languages to date. This document is revised in line with legal developments or changes in activities.

## **b. Formations**

The **Code of Conduct e-learning module** is mandatory for employees (permanent contracts, fixed-term contracts, VIEs, interns and apprentices). **It has been followed in English by all the Group's managers and engineers.** This module is currently available in 7 languages and is regularly supplemented by new translations.

The **anti-corruption e-learning module** is followed by all the Group's managers and engineers and by all employees in exposed functions (purchasing, sales, logistics, finance). This module is available in 22 languages and has been designed to detect and prevent the risks of corruption and factual situations encountered by the Group in all the countries in which it operates.

## **c. Alert procedure**

In accordance with the provisions of the Code of Conduct, the Group has set up a whistleblowing system. This system is open to the Group's corporate officers and employees, as well as to all stakeholders, to report any breach or irregularity:

- a crime or offence;
- a serious and manifest violation of an international commitment regularly ratified or approved by France;
- a serious and manifest violation of a unilateral act of an international organisation taken on the basis of a regularly ratified international commitment;
- a serious and manifest violation of the law or regulations;
- a threat or serious harm to the general interest;
- the existence of conduct or situations contrary to the Group's Code of Conduct, insofar as these are likely to characterise acts of corruption or trading in influence;
- a risk or serious infringement of human rights and fundamental freedoms, the health and safety of individuals and the environment, resulting from the activities of the company and those of the companies it controls.

Reports of such irregularities are collected by e-mail ([corporatesecretary.ethicsalert@plasticomnium.com](mailto:corporatesecretary.ethicsalert@plasticomnium.com)) or by letter (Compagnie Plastic Omnium, Alerte Éthique, 1 allée Pierre-Burelle, 92300 Levallois-Perret). Employees can also alert their managers or any other person if they wish.

Alerts are treated anonymously. The process is described in the Code of Conduct, available in 22 languages on the intranet and on the Group's website.

A dedicated committee oversees monitoring and processing these alerts (excluding HBPO, whose alerts are reported by the Compliance Officers, but following the acquisition of HBPO, the process will be modified in 2023 to include the PO Modules business). This ad hoc committee is composed of the Compliance, Human Resources and Internal Audit Departments. It studies alerts, the need to call on an internal or external third party to investigate, decides on the response to the alert, monitors progress and/or closes the alert.

## **d. Vigilance plan**

Law no. 2017-399 of March 27, 2017 on the Duty of Vigilance of parent companies and ordering companies introduced for parent companies of groups employing more than 5,000 employees in France or 10,000 employees in France and abroad, the obligation to develop, publish and implement appropriate measures to identify risks and prevent violations of human rights and fundamental freedoms, personal health and safety, and the environment that may result from the activities of the Group and its subsidiaries, as well as those of suppliers or subcontractors with whom it has an established commercial relationship.

Plastic Omnium meets the requirements of the Duty of Care Act by establishing a Compliance Plan that sets out the various steps taken to address each issue:

- Human rights and fundamental freedoms;
- Human health and safety;
- The environment.

The report on the effective implementation for the year 2022 is integrated into the Vigilance Plan by giving operational applications and referring to the monitoring indicators identified. The measures concern subsidiaries and suppliers.

Plastic Omnium's Vigilance Plan can be consulted via the [Universal Registration Document](#).

#### **e. Supplier Charter**

Plastic Omnium aims to involve all its suppliers, service providers and subcontractors (the "Suppliers") in its human rights commitments. The purpose of the Supplier Charter is to express the expectations of Plastic Omnium and its subsidiaries regarding its suppliers (existing or potential) in terms of CSR. The Supplier Charter addresses human rights in the following parts: Section 3 "Human rights and working conditions" and Chapter 4 "Health and safety protection".

The Charter applies to all Plastic Omnium suppliers and is part of the documentation that Plastic Omnium asks suppliers to sign during its consultations. By adhering to this charter, the supplier undertakes to respect and implement, as well as to ensure that its own suppliers respect, all the principles set out in it.

The supplier undertakes to implement within its organization the rules and procedures necessary to ensure compliance with the commitments set out in the charter and to regularly assess their proper application.

#### **f. Control procedures and actions**

The monitoring of respect for human rights is integrated into the procedures for the prevention of risks that concern employees and stakeholders in the value creation chain:

- Health - Safety and working conditions risk;
- Human Resources risks;
- Business ethics risk;
- Responsible purchasing risk.

The management of these various risks involves the implementation of associated policies and procedures such as:

- the Group Code of Conduct;
- the Suppliers' Charter and supplier assessments (EcoVadis);
- the Vigilance Plan and the Responsible Purchasing Policy;
- the Group's Tax Policy;
- the Human Resources Strategy;
- the Code of Compliance with competition law;
- compensation policies and collective incentive policies, health cover and a Group Savings Plan;
- the Personal Data Protection policy;
- the Top Safety and Top Planet programs.

In addition, specifically concerning the subject of anti-corruption, the Group has implemented the following control procedures:

- Risk mapping;
- Accounting control procedures;
- Third party evaluation procedures;
- Control and evaluation system (level 2 and level 3 controls);
- Whistleblowing procedures;
- Disciplinary regime.

### **3. Integrating human rights into the value chain**

Plastic Omnium is developing a responsible approach to purchasing and procurement. The Group is committed to assessing its suppliers' compliance with sustainability requirements through its Know Your Suppliers program, which includes:

- Specific governance: the Supplier Compliance Committee;
- Dedicated procedures;
- Evaluation and monitoring tools.

This approach is based on a prerequisite: signing the supplier charter. It is then based on a systematic evaluation of a panel of suppliers, the "Supplier Compliance Panel". The "Supplier Compliance Panel" is set up each year according to objective criteria such as the volume of business or the nature of the relationships that suppliers have with the Group, taken from the risk map.

In addition to these systematic evaluations, more in-depth evaluations according to criteria defined each year are carried out in partnership with ECOVADIS on selected suppliers, with their agreement. The third-party assessment process is identical for all subsidiaries in all divisions, as stipulated in Plastic Omnium's purchasing procedures.

Supplier information, including ESG compliance scores or ECOVADIS scores, is made immediately available to all buyers in the Group's digital purchasing suite. Buyers can manage their portfolios based on these scores. Suppliers with a low risk are not subject to additional diligence ("Follow up"). Suppliers with a medium risk are asked to commit to improvement initiatives, the first step of which must be an in-depth assessment of their ESG performance ("Engage"); in this respect, buyers systematically ask them to sign up to an ECOVADIS or equivalent assessment process. Finally, the most at-risk suppliers must be subject to a remediation plan that can go as far as the definitive suspension of business relations ("Remediate").

The Supplier Compliance Committee meets at least three times a year to ensure that the process is operating smoothly, to approve remediation measures for the most at-risk suppliers and, more generally, to define changes in the system based on the guidelines issued by Compagnie Plastic Omnium's senior management in light of current international regulations.

Plastic Omnium's commitment as a supplier is recognized by the Platinum status awarded by EcoVadis (with a score of 80/100).

#### 4. Governance, due diligence

The **Internal Control and Compliance Committee** is composed of the Human Resources and Sustainability, Finance, Compliance, Risk and Internal Audit, Legal and Business Departments. It guides the Group's policies and actions and is supported by a network of Compliance correspondents around the world.

The **Audit Committee**, which reports to the Board of Directors, reviews the deployment of the Group's compliance and anti-corruption program.

The **Nominations and CSR Committee** is composed of three members of the Board of Directors. It examines, among other things, the Group's environmental, social and societal responsibility issues and gives the Board an opinion on the non-financial performance declaration provided for in Article L. 225-102-1 of the Commercial Code.

#### 5. Reference documents

<b>Universal Registration Document:</b>	<a href="https://www.plasticomnium.com/wp-content/uploads/2023/04/plastic-omnium-universal-registration-document-2022-en.pdf">https://www.plasticomnium.com/wp-content/uploads/2023/04/plastic-omnium-universal-registration-document-2022-en.pdf</a>
<b>Code of conduct:</b>	<a href="https://www.plasticomnium.com/wp-content/uploads/2021/01/plastic-omnium-code-of-conduct-en.pdf">https://www.plasticomnium.com/wp-content/uploads/2021/01/plastic-omnium-code-of-conduct-en.pdf</a>
<b>Vigilance plan:</b>	<a href="https://www.plasticomnium.com/wp-content/uploads/2023/04/plastic-omnium-universal-registration-document-2022-en.pdf">https://www.plasticomnium.com/wp-content/uploads/2023/04/plastic-omnium-universal-registration-document-2022-en.pdf</a> (page 197)
<b>Supplier charter:</b>	<a href="https://www.plasticomnium.com/wp-content/uploads/2021/01/plastic-omnium-supplier-csr-charter-en.pdf">https://www.plasticomnium.com/wp-content/uploads/2021/01/plastic-omnium-supplier-csr-charter-en.pdf</a>
<b>Compact Engagement:</b>	<a href="https://unglobalcompact.org/participation/report/cop/active/468141">https://unglobalcompact.org/participation/report/cop/active/468141</a>

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