

ENVASES METALURGICOS DE ALAVA, S.A.

Code of Ethics and Social Responsibility



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SOCIAL RESPONSIBILITY AS A FUNDAMENTAL VALUE

Envases Metálgicos de Álava was born more than 70 years ago as a family business.

Thanks to the high level of investment in innovation and the patented technologies that allow us to offer a wide range of aluminium cans and bottles, modern production plants and internally developed tools, we have managed to get prestigious customers to place their trust in our wide range of products and in the high reactivity and safety of our service.

We are a company committed to ensuring that people working in Envases develop their professional potential and enjoy opportunities for internal promotion within a climate of job stability.

We seek to contribute to local development through the generation of employment, collaboration with administrations and the development of sustainable and environmentally friendly products.

As an example of our ethical commitment and support for international principles, we are a signatory to the Global Compact and we promote compliance with these principles throughout our supply chain.

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PURPOSE AND SCOPE

This document establishes the principles, values and rules that govern the behaviour of Envases in the development of its products and services and in the relations with the different interest groups.

Its application contributes to the sustainable development of the company from the respect of the legislation.

This Code applies to all employees of Envases in all the professional areas in which it represents the organisation.

MISSION, VISION AND VALUES

The values defined in this document are assumed and applied by the people who are part of Envases.

MISSION

Envases Metalúrgicos de Álava bases its activity on the manufacture of aluminium monobloc containers for industries with high quality demands, mainly in the pharmaceutical and cosmetic industry.

We provide our customers with sustainable and innovative solutions in terms of products and services, using their expectations and needs as a reference, managing to satisfy them by balancing quality, flexibility in service and cost.

VISION

We want ENVASES METALURGICOS DE ALAVA to be internationally recognized as:

- A company with its own technology that manufactures products with a high added value.
- An innovative company for the service provided to its clients in the development of new dispensing solutions and alternative uses of aluminium containers.
- A sustainable company leader in creativity in our sector of activity.
- A Company committed to
 - compliance with legal requirements and other commitments that ENVASES may voluntarily subscribe to.
 - continuous improvement and optimisation of resources.
 - the quality of both the service and the product.
 - respect for the environment and sustainability

GUIDELINE VALUES

1. To develop a team of well-prepared and motivated professionals, with a team spirit attitude, betting on equality, promoting training as a means to achieve their own professional and personal development.
2. To understand and satisfy the needs of our customers, striving to improve our products, processes and services using as tools creativity and innovation in the management of all areas of the company.
3. To establish transparent relationships with customers and suppliers that translate into mutually beneficial, profitable and sustainable business over time.
4. To build a team of well-prepared and motivated professionals, with a team spirit attitude, betting on equality, promoting training as a means to achieve their own professional and personal development.
2. To understand and satisfy the needs of our customers, striving to improve our products, processes and services using as tools creativity and innovation in the management of all areas of the company.
3. To establish transparent relationships with customers and suppliers that translate into mutually beneficial, profitable and sustainable business over time.
4. To work to achieve sustainable development by adapting our manufacturing processes to reduce our environmental impact.
5. To respect human rights with working conditions that favour safety and health at work and human and professional development.
6. The business and professional activities of ENVASES and its employees will be based on the value of integrity and will be developed in accordance with the principles of honesty, avoiding all forms of corruption.
7. ENVASES undertakes to maintain socially responsible behaviour, assuming responsibility for respecting cultural diversity and the customs and principles in force among the different stakeholders.

UNITED NATIONS GLOBAL COMPACT

Envases adopts the 10 principles of the UN Global Compact as the basis for sustainable and responsible development.

Envases is a signatory of this pact and bases its ethical principles on those of the Global Compact:

Human rights

1. Promote and respect the protection of human rights.
2. Ensure that the Company is not complicit in human rights abuses.

International Labour Standards

3. Respect the freedom of affiliation with trade unions and recognize the right to collective bargaining.
4. Contribute to the elimination of all forms of forced or compulsory labour.
5. Contribute to the effective abolition of child labour.
6. Contribute to the elimination of discrimination practices in employment and occupation.

Environment

7. Apply a precautionary approach to environmental problems.
8. Take initiatives that promote greater environmental responsibility.
9. Encourage the development and dissemination of environmentally friendly technologies.

Fight against corruption

10. Act against corruption in all its forms, including extortion and bribery.

PRINCIPLES AND GUIDELINES FOR ACTION

The general principles established in this Code are the basis of the Company's activity. Our principles are based on compliance with the principles of the Global Compact through the promotion of:

INTERNAL ETHICAL BEHAVIOUR

- EQUAL OPPORTUNITIES AND NON-DISCRIMINATION, not practicing any type of discrimination in relation to gender, sexual preferences, family situations, age, disability, race, culture, nationality, opinions or religion among others.
- CONCILIATION, taking measures to promote personal and family reconciliation with work.
- RESPECT FOR COLLECTIVE RIGHTS, promoting communication, participation and consultation and collective bargaining in all areas recognised by law.
- SAFETY AND HEALTH IN THE WORK, developing the tasks with respect to the norms of security, hygiene and ergonomics and respecting the security of the people who work for Envases.
- ETHICAL BEHAVIOUR AND RESPECT FOR THE REGULATIONS, respecting the instructions established both in relation to the environment and occupational safety and commercial transactions.
- NO TO HARASSMENT, respecting human dignity and prohibiting any act of moral or sexual harassment.
- USE OF PROPERTY AND MATERIALS OF ENVASES, avoiding any inappropriate use of goods and materials owned or entrusted by third parties, and in particular any waste or use for personal purposes.

ETHICAL BEHAVIOUR IN MANAGEMENT

- PROFESSIONALISM, avoiding the participation in the companies with commercial relations with Envases if this can provoke a situation of conflict of interest and carrying out the tasks with respect to the ethics and the goods of the company avoiding any inappropriate use or use with personal ends.
- IMPROPER GIFTS AND HOSPITALITY, Modest gifts and hospitality may be permissible so long as they are not provided as a quid pro quo, are modest in value, infrequent, unsolicited, given on a customary gift giving occasion, reasonable and customary in our business. Cash and cash equivalents such as gift cards and gift checks are never acceptable.
- THE TRANSPARENCY OF INFORMATION: The economic-financial information of the Company and, in particular, its annual accounts, will faithfully reflect

the economic, financial and patrimonial reality of the Company in accordance with the generally accepted accounting principles applicable to it, in accordance with the regulations in force at any given time.

- COMPLIANCE WITH THE PRINCIPLES OF THE UN GLOBAL COMPACT, and promotion among its stakeholders.
- RESPECT FOR PEOPLE IN PROFESSIONAL RELATIONSHIPS, ensuring confidentiality, honesty and transparency in relationships.

ETHICAL BEHAVIOUR IN RELATIONS WITH SHAREHOLDERS AND PUBLIC ADMINISTRATION

- RESPECT FOR LEGISLATION, acting in accordance with the laws, regulations and standards in force.
- TRANSPARENCY, in the communication of accounting and financial data.
- RESPONSIBLE AND SUSTAINABLE MANAGEMENT OF THE ORGANIZATION.
- RESPECT FOR THE ENVIRONMENT, promoting the efficient use of resources and the correct segregation and management of the waste generated.

ETHICAL BEHAVIOUR IN RELATIONS WITH CUSTOMERS, SUPPLIERS AND SOCIETY.

- PROMOTION OF COMPLIANCE WITH ETHICAL PRINCIPLES, ensuring the dissemination of this code and that both suppliers and subcontractors of Envases are governed by ethical principles compatible with ours.
- Fair COMPETITION in our sector by refraining from any behaviour or practice contrary to the rules of competition and any practice of corruption.
- QUALITY OF PRODUCTS AND SERVICES. Our quality system ensures the quality of products and services provided.

CODE COMPLIANCE

This Code constitutes the frame of reference for the present and future actions of Envases. All employees, regardless of their function or hierarchical level, must act in accordance with these principles.

In the event that situations not complying with these principles are detected, or could not comply with the principles contained in this Code, this situation should be communicated to the e-mail RSC@envases.org, with a guarantee of confidentiality throughout the process of managing the report made.

