

# Code of Conduct



# A message from our CEO



“At Trivium Packaging, our mission is to responsibly provide the highest quality and most sustainable metal packaging solutions to better everyday lives”.

Dear colleagues and other stakeholders,

This Code of Conduct contains principles to give us guidance on how we should operate. Each of us needs to know, understand and apply these principles in our daily work, regardless of location, function or level in the company.

Our culture stems from the following core values: Passion, Teamwork and Excellence. These core values allow us to meet our commitments to our customers, partners, suppliers and stakeholders, and to promote ethical corporate behaviour within Trivium Packaging and with respect to third parties.

In an ever-changing world, it's not easy to assess situations and evaluate their associated risks. It takes courage to act with integrity beyond mere compliance with law and regulation. This Code of Conduct helps us in making the right choices. We should all live by this Code and commit to the highest level of integrity and trustworthiness.

By following this Code, you support Trivium to stay true to its commitments by maintaining credibility, competitiveness and a great work environment.

If you have any questions, I encourage everyone to engage with our Legal & Compliance team to seek advice.

Thank you for your dedication.

Regards.

**Michael Mapes,**  
Chief Executive Officer

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# Why our Code of Conduct is important

This Code of Conduct is intended as a guide to help us 'do the right thing, in the right way, at the right time and for the right reason!'

This Code of Conduct applies to everyone who works for Trivium, from employees to contractors, but also to third parties conducting business on our behalf or in our name (e.g. agents, consultants), wherever in the world.

It does not describe every law, practice or policy that applies to you, but it sets out rules covering ethical practices which can sometimes go beyond what is strictly required by law. You should also read our employees' handbooks and other policies and procedures. We must comply with all national and international laws, rules and regulations which govern our operations. Certain national laws may sometimes differ from the principles set out herein. If this is the case, any waiver requires the prior approval of our Chief Legal Officer.

If you cannot find a clear answer to an issue, use good judgment and discuss with your manager, if needed. And, if you are a manager, you are also a role model. Help your team understand how to live our principles.

We each have a responsibility to be familiar with our Code of Conduct and to follow and convey its values in our dealings with those who work with and for us. We expect the same level of commitment from our customers, suppliers and other third parties with whom we conduct business.

To ensure your compliance with our Code of Conduct, you will be asked by your local HR to complete and sign a certificate of compliance, as provided in Appendix B to this Code of Conduct (all appendices are available internally for our employees on the Legal & Compliance portal). Employees with certain managerial responsibilities may also be asked to regularly re-certify, as their role may be particularly exposed to compliance risks.

Please keep in mind that failure to conduct business in compliance with this Code of Conduct may result in disciplinary action, up to and including termination of employment, and will be reported to the relevant authorities, as required.

For specific questions, please refer to your relevant key global contact (see Appendix A to this Code available internally on the Legal & Compliance intranet).

If you would like further information about any aspect of the Code or have any general queries, please contact:

**Charlotte van Meer**  
Chief Legal Officer

**Maruschka Graham**  
Senior Legal Counsel Compliance & Competition

You can also write to  
**[legalandcompliance@triviumpackaging.com](mailto:legalandcompliance@triviumpackaging.com)**

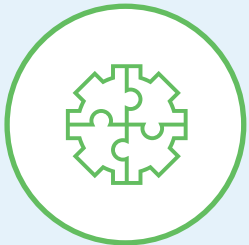


# Our Core Values



## Passion

Every day we strive to positively impact Trivium and society. We are enthusiastic, aim high, commit and are accountable.



## Teamwork

With safety as our first priority, we harness the power of collaboration. We do this with humility, trust, integrity and openness.



## Excellence

We aspire to shape our industry through world class performance and exceptional value creation for all our stakeholders.

Our Core Values define our identity, shape our culture and inspire us to build a successful business. They drive us to make the right choices and are embedded in our company principles.

### Principle 1

**Doing business in a fair and honest way**

### Principle 2

**Protecting people and the environment**

### Principle 3

**Treating each other with respect**

### Principle 4

**Securing company information and assets**



# What is expected?

## Speak up!

### What is expected?

- Follow the law and our Code of Conduct
- Stand for our core values and company principles
- Lead by example, understand the risks in your role and how to manage them
- Report any breaches
- Seek advice when in doubt
- Complete compliance training when assigned to you
- Make sure any third-party contractors, agents or consultants are aware of our Code of Conduct and are required to comply with it.

### When confronted with an issue to which you cannot find a clear answer, please ask yourself:

- Do I understand the risks?
- Is this legal?
- Does it follow the law and our Code of Conduct?
- Is it fair and honest?
- Will it look good on Trivium Packaging and myself?
- Would I feel OK if this appeared in the media?

**If one of the answers is NO, don't engage and report if needed.**



For guidance, please reach out to Legal & Compliance



Never take it upon yourself to investigate a matter.



# How do I raise a concern?

If you are confronted with a difficult decision or if you witness or suspect a violation of the rules set out in our Code of Conduct, please reach out to your manager or local HR. If you are aware of a violation, it is your duty to report it. We encourage you to voice your concerns directly by favoring these internal reporting channels.

However, if for any reason you do not feel comfortable doing so, you can report on an anonymous and confidential basis by calling our hotline or visiting the hotline web reporting site (for instructions, see Appendix C to this Code available on the Legal & Compliance intranet). Our reporting tools are hosted externally by Navex, a specialized service provider, on a site called EthicsPoint.

Reported allegations will be investigated by the relevant members of our Compliance Committee which is composed of senior representatives from our key functions. Members may choose to be assisted by someone in their team or externalize the investigation to external advisers as it may seem fit. You should never take it upon yourself to investigate the matter.

Investigations will be conducted with the highest degree of integrity, confidentiality and impartiality, and in an appropriate and timely manner. If it is established that a violation has occurred, the necessary corrective and/or disciplinary actions will be taken and legal proceedings will be initiated, as relevant.


No disciplinary measures or any form of retaliation will be brought against an employee, who has raised a concern in good faith, even if the report turns out to be unfounded.



For guidance, please reach out to Legal & Compliance

# Doing business in a fair and honest way

- We fight bribery & corruption
- We do not mix business and personal interests
- We compete in a fair and honest way
- We promote social responsibility
- We comply with trade restrictions

A photograph showing two people in business attire shaking hands. The person on the left is wearing a light-colored suit jacket, and the person on the right is wearing a white shirt and a dark tie. The background is a bright, slightly blurred outdoor setting.

Trivium Packaging is committed to doing business in a fair and honest way, whether with its employees, customers, suppliers or other third parties.



# What is a bribe?

A bribe is defined as a payment in cash or in kind, including goods, travel, services, and the use of another company's property, given to someone with the intent of obtaining favorable treatment from the recipient or a third party.

## 1. Fighting bribery and corruption

As part of its commitment to ethical business practices, Trivium does not tolerate any form of bribery or corruption and requires that all its employees, suppliers and third parties working on its behalf are aware of and comply with the national anti-corruption laws of the countries where we operate, including the two following laws which have a wider impact on our business: the US Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act ("UKBA").

Under both the FCPA and the UKBA, Trivium may be held criminally liable if anyone providing services to us pays a bribe on our behalf.

As a basic rule, DO NOT offer or accept bribes either directly or indirectly through a third party, e.g. an agent, representative or intermediary.



### Facilitation Payments

Facilitation payments are small payments or fees requested by government officials without legal basis to speed up or facilitate the performance of routine government action (such as the provision of a visa or customs clearance).

In some countries, it may be considered normal practice to make such payments, but they are often nonetheless illegal in these countries. Trivium does not allow any facilitation payments.

### Agents, representatives and intermediaries

Agents, representatives and intermediaries engaged to represent Trivium's interests must comply with our Code of Conduct and appropriate agreements should be put in place to that effect. Where relevant, agents, representatives and intermediaries may also be asked to certify their compliance on a regular basis.

Before engaging a third-party, a thorough risk-based due diligence must be undertaken to review whether:

- the use of such person is necessary;
- the proposed person is appropriate for the role (including by reference to their expertise and any possible conflict of interest); and
- the proposed remuneration is appropriate.

For all third parties established or providing services for us in a country where the Corruption Perception Index is below 50 (as determined by Transparency International: see <https://www.transparency.org/>) or if government officials or lobbyists are involved, the due diligence process should be carried out under the supervision of Legal & Compliance.

Doing business in a fair and honest way



# Bribes can come in all shapes and sizes

## Examples of bribes and reporting obligations

**Bribes often involve monetary payments, but can include other benefits or advantages, such as:**

- extravagant gifts, entertainment or travel expenses, particularly where they are disproportionate, frequent or provided in the context of on-going business negotiations;
- loans, loan guarantees or other extensions of credit;
- providing a (sub-)contract to a person connected to someone involved in awarding a main contract; and
- political or charitable donations made to a third party linked to, or at the request of, someone with whom we are doing business.

## What if?

- If you find yourself in any of these situations or know of someone who engages in such behaviour, please inform Legal & Compliance and your manager or local HR immediately.
- We understand that modest gifts, hospitality and donations may foster good business relationships. However, if the total value of these exceeds a nominal or perceived value of €150 (or equivalent) over a twelve-month period, you must obtain approval from your local HR who will record this in a central register.
- Approval from HR and Legal & Compliance is needed for any gifts and hospitality involving a government official or employee, regardless of the value.





## 2. Dealing with conflicts of interest

A conflict of interest is a situation (i) posing a risk that personal interest will interfere or (ii) creating an appearance of impropriety, which may undermine confidence in the objectivity of Trivium's business decisions. You must not let any decisions you make at Trivium be influenced by personal considerations such as relationships or external interests of yourself, family or friends.

It is therefore essential to identify any potential conflicts of interest and handle these effectively.

To that effect, we should all disclose actual or potential conflicts of interest, whether or not you think it will actually influence your decision, especially if involved in contracting, purchasing or selling. Any involvement in political activities in your own time should also be reported. Disclosure should be made to Legal & Compliance.

## 3. Respecting free competition

Trivium supports a competitive marketplace while at the same time adhering to both the letter and spirit of competition / antitrust laws in all jurisdictions where we do business. Competition / antitrust laws are designed to protect free enterprise and fair competition.

We take compliance with these laws very seriously and do not tolerate any breach of them. Therefore, we should respect these and not engage in any agreement, understanding or arrangement, expressed or implied, formal or informal, which restricts or aims to restrict competition.

### The most serious example of an anti-competitive agreement is a cartel which can consist of agreements or understandings with competitors to:

- Fix sale or purchase prices ("**price fixing**");
- Fix other terms of sale or purchase;
- Restrict capacity or output;
- Refrain from supplying a product or service;
- Divide markets, customers or territories;
- Agree who should win contracts or tenders ("**bid-rigging**"); or
- Exclude competing firms from the market.



For guidance, please reach out to Legal & Compliance

Doing business in a fair and honest way



# A few rules to abide by



- Do not allow new joiners to share confidential information about competitors;
- Do not exchange with competitors directly or indirectly (through suppliers or other intermediaries), and note that specific rules apply to meetings with competitors in context of trade associations;
- Do not abuse a potential position of dominance, and
- Do not impose restrictions on suppliers or customers.



#### 4. Promoting social responsibility in the value chain

We encourage other companies to implement proper social responsibility standards through its procurement decisions. It is our policy to support good practices on ethical, social, environmental, health and safety and gender equality criteria in other companies.

##### **Conflict Free Tin Sourcing**

We are committed to ensuring conflict free tin sourcing in order to comply with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act on Conflict Minerals. This law defines conflict minerals as certain minerals (such as Cassiterite for tin production) originating from the Democratic Republic of Congo or adjoining countries. Our suppliers of products containing tin need to demonstrate traceability and accountability of the raw materials they deliver to us.

##### **Respect for property rights**

It is our policy to promote respect for property rights and not engage in activities that violate them such as counterfeiting and product piracy.

##### **Ongoing sustainable responsibility in our supply chain**

In a context where market dynamics, regulations and requirements are constantly evolving, it is challenging for companies to find the right balance. The scarcity in supply, the demand of emerging markets and the pressures brought upon by cost need to be weighed against supporting reductions in energy consumption and waste. We closely monitor and measure the risks and possibilities in the supply of our materials.

We seek to work with contractors and suppliers who contribute to sustainable development and are economically, environmentally and socially responsible.

A supplier's relevance and responsibility in terms of environmental protection depends essentially on their type of activities (e.g. production, services, project work) and the resources being used. We therefore categorize our suppliers depending on their environmental impact.

#### 5. Complying with trade restrictions

Some countries have trade controls that restrict certain business transactions and movement of goods across borders. We must comply with all applicable import and export control laws and regulations. We all are responsible to determine whether our activities are subject to special controls, and if so, to comply with them.

Each business location is also responsible for maintaining import, export, and customs records in accordance with applicable laws and our relevant guidelines and must provide accurate and truthful information to Customs and other relevant authorities.

Failure to comply with these laws could lead to fines, delays, seizure of goods or loss of any export or import privileges, as well as to damage to our reputation or even imprisonment for individuals. It is therefore crucial that you are aware of the requirements and how they apply to your role. By doing so, you are helping us to continue doing business internationally.



For guidance, please reach out to Legal & Compliance





# Protecting people and the environment

- We provide a healthy and safe environment
- We follow health and safety procedures

Trivium Packaging is committed to responsible environmental practices that minimize our impact on the environment, protect the safety and health of our employees and the public, and promote sustainability in relation to our products and operations.



# Employees are encouraged to participate in the risk assessment process

## 1. Protecting ourselves and the others

Trivium strives to prevent accidents, occupational injuries and workplace illnesses by providing the appropriate training and support for employees, suppliers, contractors and visitors. All must observe and maintain health and safety rules, as applicable within the relevant facilities.

We believe that it is essential for all employees to be involved in creating a collective safe workplace, and more generally, a safe work environment.

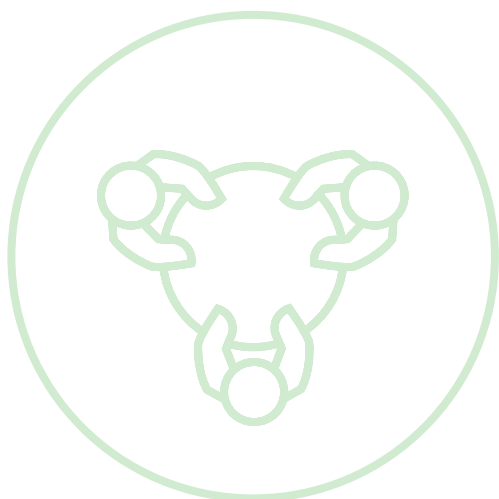
Trivium is dedicated to principles and practices of continuous improvement in striving to provide high quality Environmental, Health and Safety (EHS) standards and practices for team members, customers, visitors, suppliers and the communities in which we live and work.



At the heart of any safety management system is a robust process of risk assessment. The process requires that risk be identified, quantified and monitored controls put in place to manage risks.

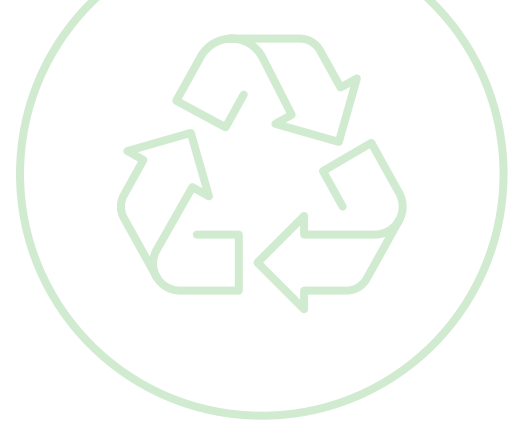
The lessons learned process also provides an input to the risk assessment process. Risks typically managed relate to machines, job tasks, handling, use and exposure to chemicals, and workplace environment such as noise, lighting or heat. Each plant is required to both establish and maintain a register of risks. Employees are encouraged to participate in the risk assessment process.

We all have the responsibility to promptly report accidents, injuries or occupational illnesses, and unsafe practices or conditions to our manager or HR.



For guidance, please reach out to the Sustainability Department

Protecting people and the environment



# Committed to reducing our footprint



## 2. Minimizing environmental footprint of our activities and products

We make continual improvements in environmental protection and demonstrate environmental responsibility through (i) environmental management systems, (ii) compliance with all relevant environmental regulations and (iii) the involvement of our stakeholders.

### Our objective:

- ensure material compliance with environmental and operational permits and other environmental regulatory requirements;
- prevent incidents with environmental impacts; and
- ensure good environmental practices and continual improvement through environmental management systems in our plants, including but not limited to:
  - (i) root cause analysis,
  - (ii) third eye review of implemented adjustments; and
  - (iii) regular reporting of the developments. Our plants are regularly audited by internal and external auditors (amongst others SEDEX and ISO) and we follow up promptly on suggested recommendations.





We will continuously evaluate and reduce the consumption of energy and raw materials and replace them with renewable materials or energy where feasible.



**We will strive to continually reduce the environmental footprint of our operations by:**

- reducing process emissions (such as Greenhouse gases, VOC, noise, odor);
- enhancing conservation and sustainable use of natural resources (such as water, energy, raw materials); and
- minimizing waste and preventing disposal to landfill. We consider the reduction of our material and non-material footprint both a requirement and an opportunity. We aim to further improve and develop the circular economy with materials that recycle forever.

We are committed to improve water security by safeguarding sustainable access to adequate quantities of acceptable quality water for sustaining livelihoods, human wellbeing, and socio-economic development. We will use water resources responsibly to mitigate the increasing water scarcity around the world.

We will continuously evaluate and reduce the consumption of energy and raw materials and replace them with renewable materials or energy where feasible.

We will identify and monitor the risks and environmental impact attached to our products during our production processes as well as during their entire lifecycle and look for opportunities to reduce these. In this context, we share relevant knowledge, expertise and experience with our suppliers, customers and other parties. We provide our customers and the general public with clear information about the environmental and safety aspects of our products and production processes.

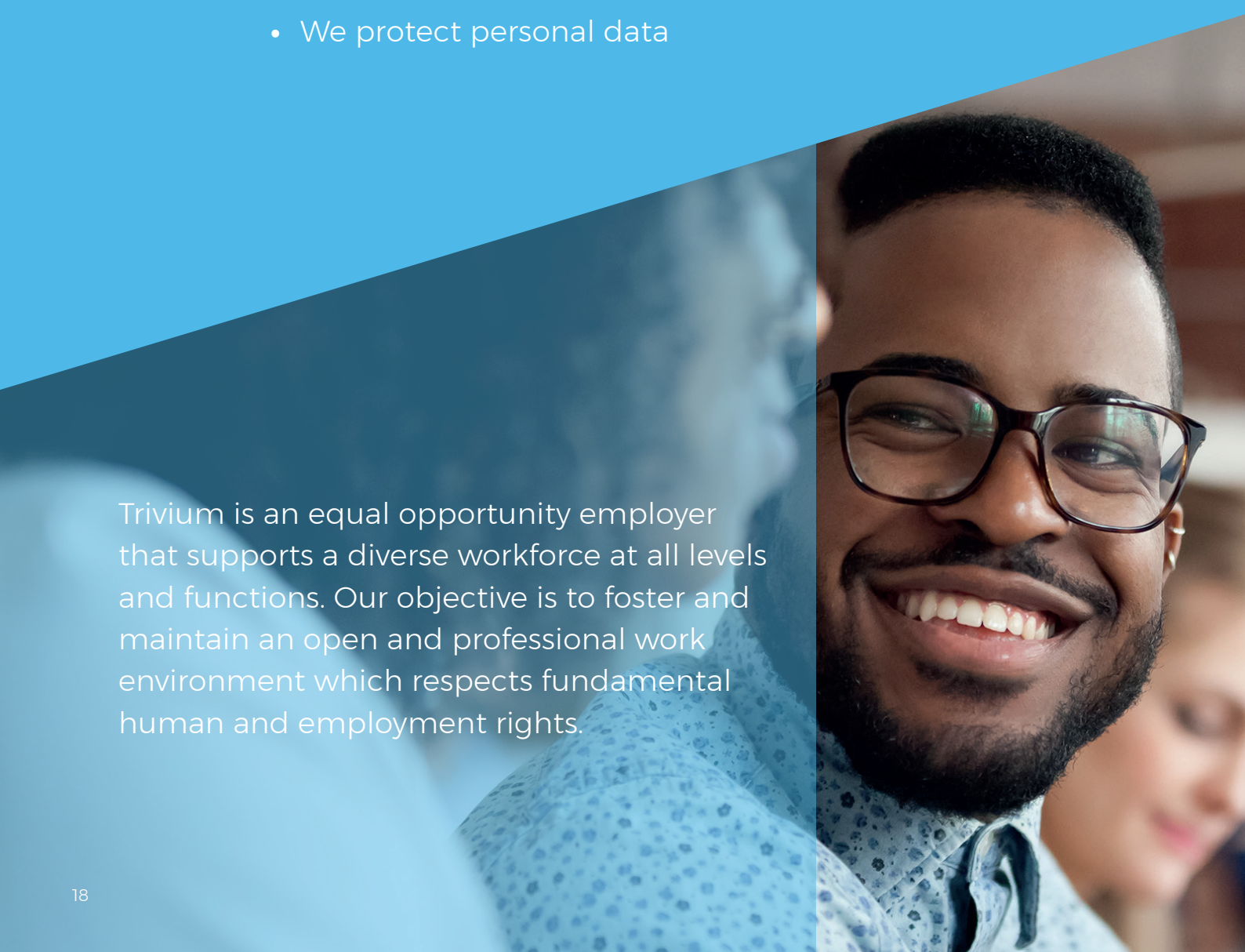


For guidance, please reach out to the Sustainability Department

# Treating each other with respect

- We respect human and employment rights
- We treat people with dignity and respect
- We recruit on an equal opportunity basis
- We manage employees fairly and support career development
- We protect personal data

Trivium is an equal opportunity employer that supports a diverse workforce at all levels and functions. Our objective is to foster and maintain an open and professional work environment which respects fundamental human and employment rights.





## 1. Respect for fundamental human and employment rights

Trivium respects the Universal Declaration of Human Rights and is committed to adhere to and support the core principles of human rights which are:

- **inherent**, in that they belong to every person by virtue of being human;
- **inalienable**, in that people cannot consent to giving them up or be deprived of them by governments or any other institution;
- **universal**, in that they apply to everyone regardless of status;
- **indivisible**, in that no human rights may be selectively ignored; and
- **interdependent**, in that realisation of one right contributes to the realisation of other rights.

Trivium also respects the International Labour Organization (“ILO”) Declaration on Fundamental Principles and Rights at Work, as well as the ILO’s Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.



Within these principles, Trivium supports, among others, the freedom of association and effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour, and the elimination of discrimination regarding employment and occupation.

We do not allow child and forced labour and we therefore put the following measures in place:

- We verify age of job applicants and employees at recruitment and run regular reports to verify compliance on the minimum age requirements;
- We verify legal working status of all employees at recruitment;
- We do not hire employees below the legal minimum working age as defined by local law;
- We hire employees below the age of 18 only in non-risk areas as defined by law; and
- We require any third-party, temporary or contract employees working for Trivium or in Trivium facilities to strictly follow all local laws related to child and forced labour.

## 2. General conditions of work and social protection

The conditions of work, wages and other forms of remuneration will comply with national laws and regulations and will be consistent with applicable international labour standards. Where applicable, remuneration systems will be transparent, including the process and criteria being used, and will be communicated to all relevant employees.

Trivium is committed to providing decent conditions of work with regards to wages, hours of work, weekly rest, holidays, health and safety, maternity protection and ability to combine work with family responsibilities.

Trivium will provide social protection for employees as required in the country of operation and compensate employees for overtime in accordance with laws, regulations or collective agreements.

Trivium promotes health and well-being, such as care programmes and career mobility.



Treating each other with respect

# Equal opportunities for all employees



Providing a workplace free of all types of harassment.

### 3. Fair employment practices

Trivium respects, values and welcomes diversity in its workforce, beyond mere compliance with laws and regulations. Our policy is to provide equal employment opportunity for all applicants and employees without taking into account factors such as ethnicity, colour, religion, gender, national origin, ancestry, age, disability, marital status or sexual orientation.

Trivium is committed to providing a workplace free of all types of harassment and will not tolerate harassment of employees by managers or co-workers.

Trivium has a policy of zero tolerance for violence. Violence includes physically harming, harassing, intimidating or coercing another human being or brandishing weapons and threatening or talking of engaging the aforementioned activities.





We are committed to providing a safe and productive working environment.

#### 4. Substance abuse

Trivium is committed to providing a safe and productive work environment which is free from the influence of alcohol, illegal drugs and other potential mind or performance-altering chemicals or substances. The improper use, sale, manufacture, purchase, transfer or possession or being under the influence of alcohol or drugs while at work is strictly prohibited.

#### 5. Complying with privacy laws

Privacy and personal data protection constitute a fundamental right. Protecting the personal data of our employees and business partners is part of our commitments, especially given the development of communication and information technologies.

If you have access to or need to process personal data, you must abide by the requirements of the European General Data Protection Regulation ("GDPR"), and applicable local privacy laws supplementing the GDPR, or any other privacy laws which may be applicable.

Personal information can include any information about an individual, such as names, identification numbers, location data, online identifiers or one or more factors specific to that individual's physical, physiological, genetic, mental, economic, cultural, or social identity ("Personal Data").

If you are aware of any security incident that has affected the confidentiality, integrity or availability of any Personal Data held by Trivium, such as the unauthorised access or disclosure by a third party, you must report it immediately to Legal & Compliance.



For guidance, please reach out to the HR Department



# Securing company information and assets

- We follow fair and accurate accounting practices
- We keep complete, accurate and timely records to ensure our business transactions are reflected properly
- We maintain sound processes and controls to safeguard our assets
- We protect confidential information and prevent insider trading
- We protect our company property and image
- We fight against fraud

Each employee is responsible for protecting our assets, whether physical (e.g. buildings, equipment, machinery, vehicles and products) or immaterial (e.g. confidential information, intellectual property).







## 1. Ensuring fair and accurate accounting practices and record keeping

Accurate, timely and complete business records are essential to managing Trivium and to maintaining and safeguarding investor confidence. Accurate and complete business records are necessary to provide complete, fair, timely, accurate and understandable financial and other disclosure to shareholders, the public and authorities. Therefore, all Trivium books, records and accounts must completely, accurately and fairly reflect our assets, liabilities and transactions based on sound business processes and controls.

Each employee is responsible for ensuring that all books, records, documents and accounts under his/her control are complete, timely, properly supported, auditable and accurately reflect all business transactions, both internally and externally.

Everyone, regardless of our position, must make sure that the information we report and record about our work is accurate and complete. This includes information we submit on expense reports, sales data, production data, contracts, monthly and quarterly reports and other corporate records.

We follow internal rules and guidelines on creation of documents as well as retention of documents.



For guidance, please reach out to Finance / Legal & Compliance

## 2. Protecting confidential information and preventing insider trading

Confidential information about Trivium (i.e. information not known to the general public) must not be disclosed to anyone outside of Trivium, except for the purposes of conducting our business. Where there is a legitimate business purpose for disclosing Trivium's confidential information to persons outside of Trivium, it is important that the recipient is aware of the confidential nature of the information and that appropriate safeguards are put in place (e.g. non-disclosure agreements).

You may also from time to time have access to information which is of such a nature that a reasonable investor would think it important in deciding whether to buy, hold or sell a security.

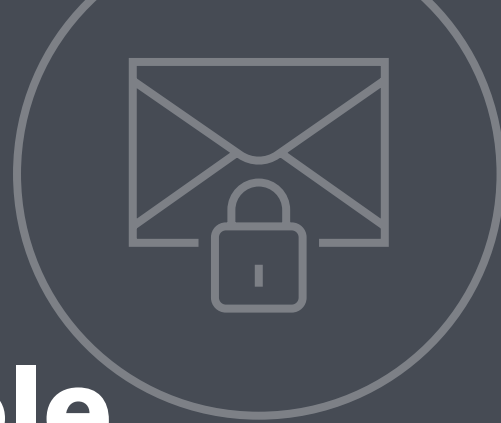
This is known as **“material non-public information”**

### Examples:

- Unpublished financial results
- Non-public plans to acquire another company or to sell an asset or business
- Planned key product announcements
- Significant pending or threatened litigation
- The gain or loss of a significant customer or supplier; and
- Changes in senior management.

The United States federal securities laws and regulations and the EU Market Abuse Regulation impose restrictions on dealings in a company's bonds and equity securities (also known as shares). These restrictions relate to bonds and equity securities that have been issued or may be issued in the future, whether or not listed, by persons who have access to material non-public information.

We are required to identify such material non-public information and maintain lists of individuals with access to such information in order to regulate its disclosure. If your name is added to a list, you will be notified accordingly. You will be asked to acknowledge your confidentiality obligations and confirm that you understand the restrictions to not trade in any company bonds or securities.



# We all have a role to play in fighting fraud

## 3. Maintaining sound processes and controls to safeguard our assets

It is our policy to ensure that transactions and other arrangements entered into by Trivium Packaging B.V. and any of its subsidiaries are committed only by those persons authorized to do so. To that effect, approval levels and limits have been determined in our Delegation of Authority Policy and you are responsible for seeking the appropriate approvals depending on the type of transaction or arrangement.

In addition, legally binding documents must be signed by or on behalf of a Trivium Packaging Group entity in accordance with the Signing Policy. This Signing Policy applies in addition to the Delegation of Authority Policy. Nothing in this Signing Policy replaces the need for appropriate internal approval in accordance with the Delegation of Authority Policy, where such approval is required.

## 4. Fighting against fraud

Trivium does not tolerate any incidence of fraud committed by any employee, including directors and officers, or any third party.

The term “fraud” refers to any action or omission, whether attempted or successful, which misleads or deceives, or which intends to mislead or deceive, any person for the purpose of obtaining an undue advantage and/or which results in an unjustified financial loss for Trivium.

### Examples:

- **Misappropriation of assets:** a theft or an improper or unauthorized use of Trivium’s assets, such as Trivium’s funds, products, supplies including scrap material and intellectual property;
- **False accounting and financial reporting:** an intentional misstatement or omission of material information in Trivium’s financial reports or accounting books;
- **Impersonation:** any action to pass off as a Trivium employee or supplier, such as document forgery to obtain undue information or payment by any means, including falsification of bank details;



## 5. Protecting our intellectual property

Our intellectual property portfolio is a valuable asset, vital to our business success and must be protected from loss, misappropriation and unauthorized disclosure. Intellectual property and confidential information includes, but is not limited to, patents, trademarks, copyrights, trade secrets, product designs, marketing and sales plans, customer and employee contact lists, financial and cost data, business plans and strategies, operating reports, pricing information, business partner information, research and development and propriety information.

We do not infringe upon the intellectual property rights of others. You must ensure that the trademarks, copyrighted materials and other intellectual property of others are used properly and only with permission.

You can only copy documents and materials with permission or when those materials are not copyrighted.

- **Malicious IT acts:** any cyber-attack or unauthorized access to Trivium's IT systems;
- **Non-compliance:** any intentional infringement of any of Trivium's policies including our policy on travel expenses.

Identifying fraud at its early stages allows Trivium to act swiftly and to mitigate any impact it might have. If you suspect or identify a fraud, you must report this immediately to your manager, finance director and/or Legal & Compliance.

Following an internal investigation, Trivium will take prompt and appropriate legal and disciplinary action when fraud is committed or attempted.



For guidance, please reach out to Finance / Legal & Compliance

Securing company information and assets



# Help us protect our assets



You should never comment on confidential or internal company matters.

## 6. Securing our networks and facilities

Our operations must be appropriately secured to protect our plants and facilities, computer systems and passwords. Do not leave visitors unescorted or sensitive areas unattended or unlocked and request identification from others whom you do not recognize. Most importantly, you must immediately report all suspicious activity to your manager or HR.

## 7. Using our assets appropriately

We provide a wide variety of assets to employees for business purposes, including computers, communications systems, and other equipment and materials. Although you may occasionally use some of these resources for incidental personal activities, it is your duty to keep this usage to a minimum and to comply with all our policies and guidelines on Internet usage. Excessive personal use of Trivium resources increases our costs and expenses, reduces availability of these resources for business needs, and may adversely affect your job performance and the performance of Trivium. You may not use any of our resources in violation of laws.

You may not allow other people, including your family and friends, to use Trivium resources for any purpose. You may not use Trivium resources to visit Internet sites that contain sexually explicit content, gambling sites or sites which advocate intolerance or hatred of others. Such misuse of assets constitutes a misconduct which may lead to disciplinary measures, including termination of employment.



# Use social media responsibly



## Marketing communications on behalf of Trivium within the course of usual business

Our marketing and sales practices reflect our commitment to honest and fair dealings with current and potential customers. Our advertising, promotional materials and product packaging must be fair, factual, complete, capable of being substantiated and may not deceive or mislead current or potential customers. You may not make false or misleading statements about our products or services, or those of competitors, in marketing and sales activities.

## 8. Protecting our image

### Communicating on behalf of Trivium Packaging outside the course of usual business

All requests from the media, legislative or regulatory entities, or other external bodies, should be referred to Communications. Press releases and general trade or consumer media interview requests are to be made only through designated authorized representatives and should be made under the direction and approval of Communications.

Unless you receive other guidance, you are expected to decline the opportunity to respond to any inquiries for news or information about Trivium, other than trade line of business.

Please refer to our Brand and Logo Guidelines for the correct use of our corporate identity.

You must not make false or misleading statements about our products or services, or those of competitors, in marketing and sales activities.

### Using social media

The use of social media has become part of our daily life. You may choose, or be required by your job, to participate in social networks, public forums on the network, Internet mailing lists and so on.

All comments should be well informed and within your sphere of expertise. You should never comment on confidential or internal company matters, including on pending legal actions involving Trivium, our customers or our partners.

You should also keep in mind that posting or commenting on online content can easily affect the image and reputation of Trivium, our employees, or business partners. Therefore, we expect you to use social media responsibly and in line with our Social Media Guidelines.

You may not represent Trivium's corporate opinion in these social media forums unless you received specific approval to do so. To avoid confusion, you should indicate in your postings that the views you express are your own and not those of Trivium.



For guidance, please reach out to Communications

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PACKAGING