

Anti-bribery Code of conduct



Edito

The rejection of any form of corruption is a principle which, shared by all of us, have guided our actions over the time.

We reaffirm it as a core principle in the Code of Ethics of Verallia under the Respect for the Law.

We apply it whether in both domestic and international transactions.

We reaffirm also our refuse to participate directly or indirectly in any form of funding for political parties or organizations nor in any form of financing of religious organizations or religious programs.

The bribery and corruption are a major hindrance to economic development and an obstacle to healthy and active competition; sharing the OECD principles, the intent is to contribute to combating corruption.

As a sign of its commitment, Verallia joined the United Nation's Global Compact, whose 10th principle states: "Businesses should work against corruption in all its forms, including extortion and bribery".

In this context, we have implemented a Zero Tolerance Policy towards corruption in all our business activities.

I ask you to prosecute our engagement in the respect of our prevention rules and procedures and to make sure that no actions undertaken by our group, in its name or on its behalf, may be considered as acts of corruption, and to officially inform all our employees and our external stakeholders of the Group's policy in the area.

Patrice Lucas,
VERALLIA SA CEO
Courbevoie, October 2023



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Introduction

Rejection of all forms of active or passive bribery is a long-standing principle that guides our actions and is shared by all of us. We apply this principle in our business practice, in our relationships with private or public partners, and in both domestic and international transactions.

Verallia is one of the world leaders in the glass industry. As our customers' partner, we seek to anticipate their needs and to respect the promise made to them: quality, logistic service and design that meeting their expectations.

Bribery is also a major impediment to economic development and an obstacle to healthy and active competition. To mark its commitment, Verallia shares the principles of the OECD and adheres to the United Nations Global Compact, the 10th principle of which states: *"Businesses should work against corruption in all its forms, including extortion and bribery"*.

Any violation of Anti-bribery and Anti-trading in influence laws is an offence punishable by criminal and civil sanctions for transgressors and offenders, including employees, officers or directors of the Company and the Company itself.

→ It is the personal responsibility of all our employees, officers and directors to make sure they are familiar with the Anti-Bribery and Anti-Trading in Influence Laws and to distribute this Anti-bribery Code of conduct.

The Sapin II Law of 9 December 2016 introduced an obligation to put in place measures to prevent and detect cases of bribery and trading in influence, both in France and abroad.

Accordingly, the purpose of this Anti-bribery Code of conduct is to provide information so that our employees, officers and directors, wherever they are located, can:

- (i) prevent our Company from being involved, both in France and abroad, in any bribery and trading in influence practices and, as the case may be,
- (ii) report, both in France and abroad, any bribery and trading in influence practices.

Reading key

"Company" means Verallia S.A. and all companies controlled by Verallia S.A., within the meaning of Article L-233-3 of the French Commercial Code, namely any company:

- | | |
|---|--|
| <p>1 in which Verallia S.A. directly or indirectly holds a fraction of the capital giving them the majority of the voting rights at that company's general meetings,</p> | <p>3 in which Verallia S.A. effectively determines the decisions taken at that company's general meetings through the voting rights it holds, or</p> |
| <p>2 in which Verallia S.A. alone holds the majority of the voting rights in that company by virtue of an agreement entered into with other partners or shareholders and this is not contrary to the company's interests,</p> | <p>4 in which Verallia S.A. is a partner in, or shareholder of, that company and has the power to appoint or dismiss the majority of the members of that company's administrative, management or supervisory bodies.</p> |

GENERAL PRINCIPLES

Fighting bribery and trading in influence



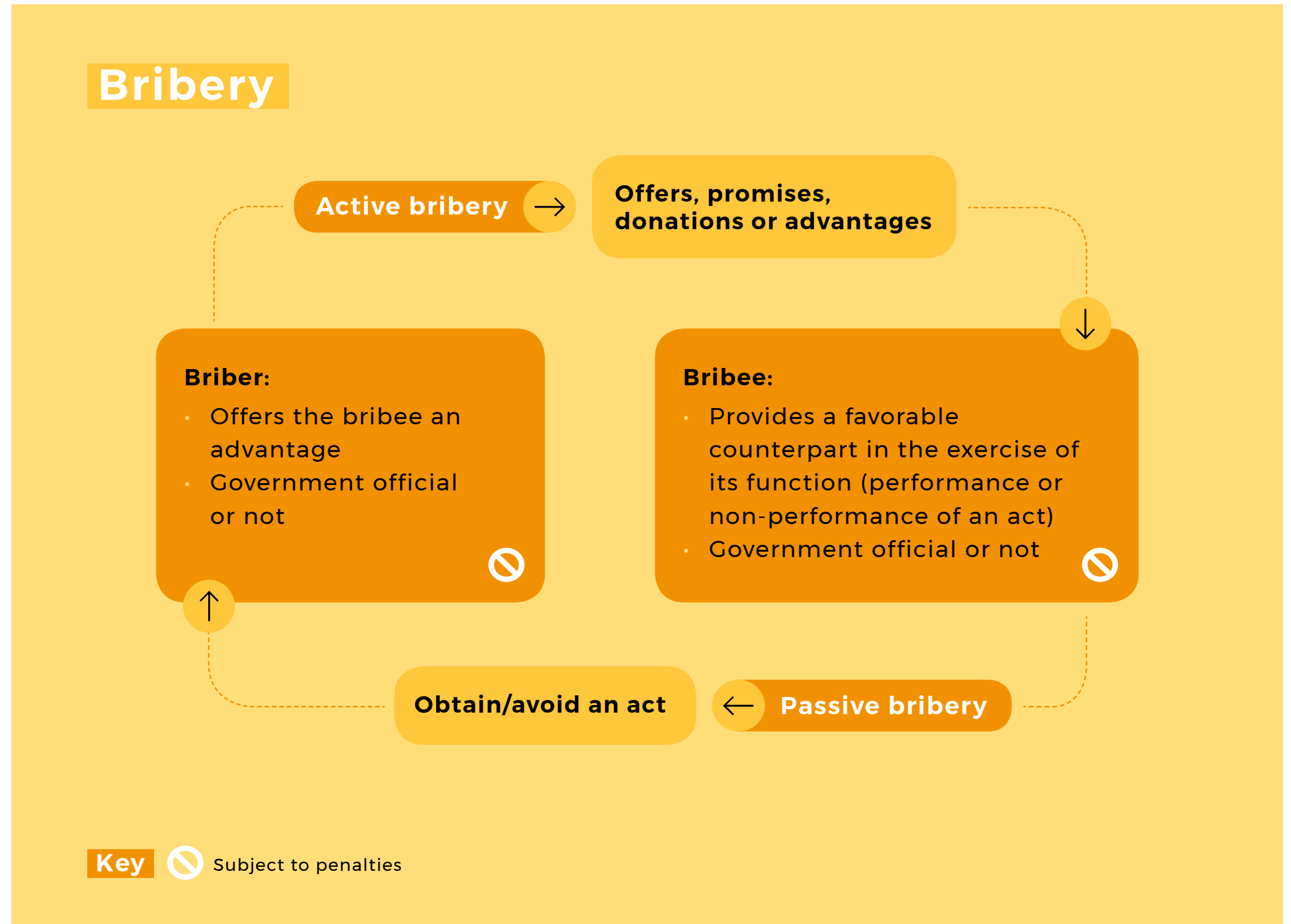
Definition

Verallia undertakes to comply with all applicable laws and regulations relating to the fight against bribery and trading in influence.

“Anti-bribery and anti-trading in influence laws” means any applicable national law or regulation covering any form of bribery and the general improper offering, giving or receiving of an Advantage, including, articles 433-1 and 445-1 of the French Penal Code together with any other applicable international conventions, including the Organization for Economic Co-operation and Development (OECD) Convention on Combating Bribery of Foreign Public

Officials in International Business Transactions, the United Nations Convention against Corruption and the Council of Europe Criminal Law Convention on Corruption, as transposed into national law.

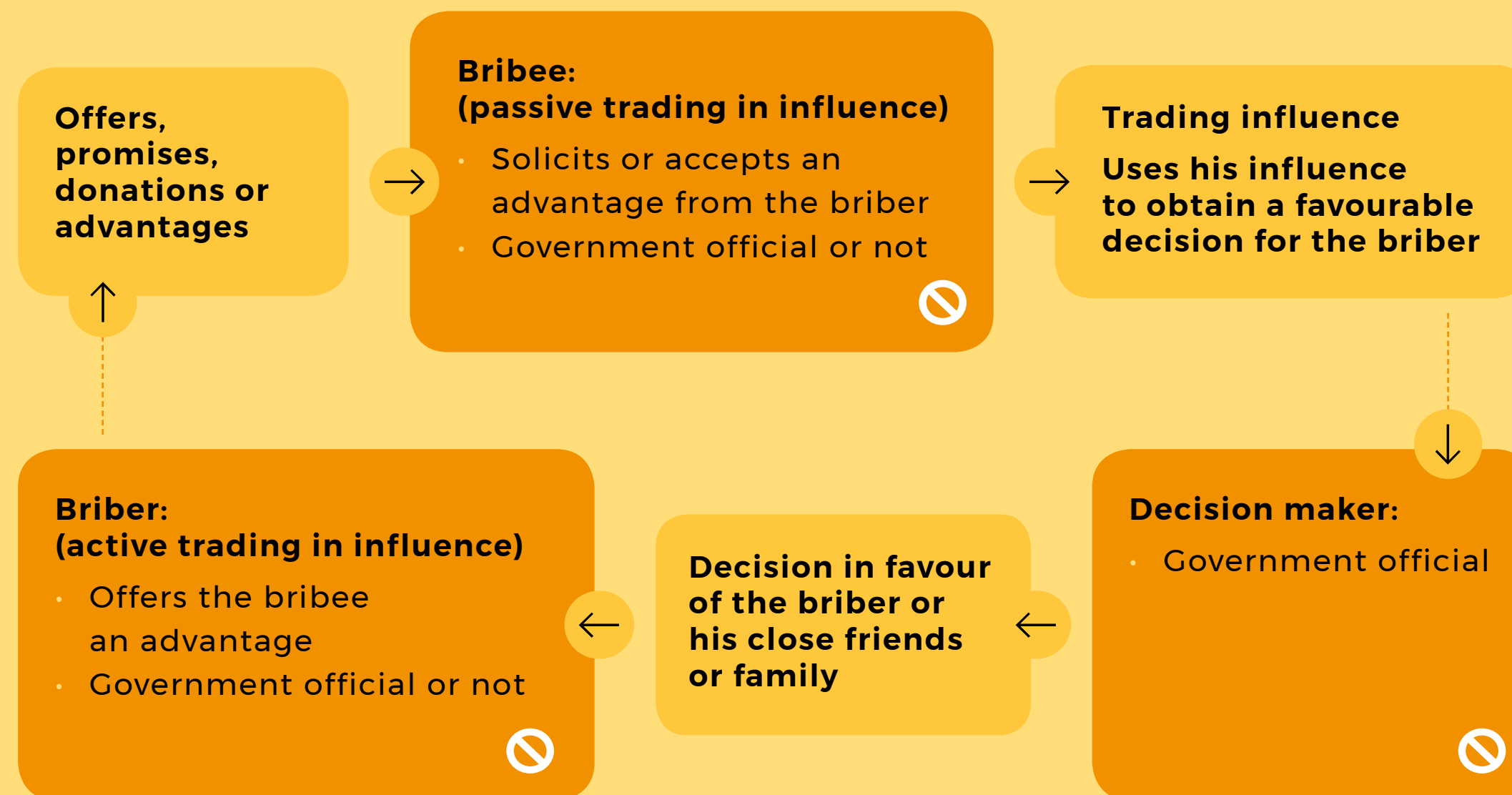
This term also refers to any foreign laws or regulations that would apply to our employees, officers and directors, because of their duties or activities, for their provisions which are stricter than the applicable national law.





Fighting bribery and trading in influence

Trading in influence



Key Subject to penalties

→ Difference between trading in influence and bribery

The distinguishing feature is that the offence of trading of influence involves the granting of an undue Advantage to the person who has a real or supposed power of influence over the public decision-maker (not to the public official itself as it would be the case in a direct bribery).

Besides, because the aim of an influence peddling scheme is to exert illegitimate influence over a public decision-maker, this offence, affecting the public sphere, is punishable by the same aggravated sanctions as those applicable to public bribery.

Generally trading in influence is used when the Company do not have direct access or contact with the public decision maker. In any case, such behaviors are strictly prohibited by Verallia.



Fighting bribery and trading in influence

→ Public and private bribery

Bribery is public when it involves a Government Official **or the representative of a public administration**. It is private when it involves a person from the private sector (e.g., a private client, a distributor, a private supplier...).

It is to be noted that the public bribery is more severely sanctioned by French Law due to the involvement of Government Official.

→ National and international bribery or national and international trading in influence

Bribery and trading in influence can result from acts in the national territory or abroad.

In any case, the corruption act is subject to legal prosecution by the French and foreign authorities and to sanctions for Verallia and the individuals involved in the corruption act.

→ Direct and indirect corruption or direct and indirect trading in influence

Bribery and trading in influence can be direct but can also be indirect: in that case, the illicit act is being committed by a third party.

Although, the act is committed by the third-party, if the bribery or trading in influence scheme ultimately benefit Verallia (e.g., the third-party acting on behalf of Verallia), the Company could be sanctioned for indirect bribery / trading in influence.

See below the rules to be implemented within Verallia to prevent those risks in all situations involving the **“Use of an intermediary”** (cf p.15 of the Anti-bribery Code of conduct).

→ “Government Official”

It means:

- any person in a position of public authority, i.e. any holder, by the delegation of the public power, of a decision-making or an enforcement power (whether exercised permanently or temporarily),
- any person entrusted with a public service task, i.e. any person who, without receiving a decision-making or an enforcement power awarded by the public power, performs a general interest task all the same,
- any person holding a public elected office, i.e. any elected person who is responsible for acting in the name and on behalf of his voters, whether or not with a decision-making or an enforcement power.

→ “Advantage”

It refers to any benefit, payment, gift, service, loan, job offer, hospitality, contribution, donation, grant or sponsorship, and more generally anything of interest to the beneficiary (in cash or in kind).



Reminder of the general principles of prohibition

We reject all forms of bribery or trading in influence and together carry out our activities with integrity, in a lawful and transparent manner.

Active bribery

In active bribery, Verallia's employees are in position of bribing an external third-party, to be "the bribers".

It is therefore forbidden for Verallia employees to bribe, that is, **to give, offer or promise to give**, any Advantage to any person (private or public) with the goal of obtaining or avoiding the performance of any act by that person in the course of his functions.

For example

Context of an administrative process: A Verallia employee offers or accepts to offer an undue Advantage to a public official to obtain an administrative amendment to an operating permit.

Context of an administrative inspection: A Verallia employee offers or accepts to offer an undue Advantage to a public official in charge of a health and safety inspection to obtain a favorable outcome for Verallia or to avoid sanctions.

- × These are cases of active public bribery. You shall not offer an Advantage to any Government Official to facilitate an administrative process or an administrative inspection.

For example

Context of sales process: A Verallia employee offers or accepts to offer an undue Advantage to a client (incl. prospects and distributors) in order to secure the renewal of an important contract or win a new contract.

- × This is a case of active private bribery involving a client. You shall not offer an Advantage to this client (like granting an excessive rebate or discount vs the usual company rules) to facilitate the conclusion of a commercial opportunity.

Context of purchases: A Verallia employee offers or accepts to offer an undue Advantage to a supplier of raw material in order to secure or obtain better conditions for Verallia (e.g. pricing, rebate/discount, commercial terms).

- × This is a case of active private bribery involving a supplier of raw material. You shall not offer an Advantage to this supplier to obtain better commercial conditions for Verallia.



Fighting bribery and trading in influence

Passive bribery

In passive bribery, Verallia's employees are in position of being bribed by an external third-party seeking to obtain a favorable decision. In that case, Verallia employees are "the bribees".

In that situation, being corrupted is also strictly prohibited for Verallia's employees, i.e. **soliciting, accepting or receiving** any Advantage from any person in connection with the improper performance of a function or an activity at our Company (the difference being that in this case, our Company, its employees, officers or directors would be beneficiaries of the Advantage).

For example

Context of call for tenders: You respond to a call for tenders for a bottle supply contract and you think you are among the top three candidates because your bid is competitive. Two days after your meeting with the tender committee, you receive a call from a person who worked on the tender procedure. He tells you that he has information about the competing offers and offers to send it to you in exchange for a case of good wine.

✗ This is a case of **private passive bribery by a supplier**. You should **formally refuse** to **give anything whatsoever** to this person in exchange for information.

Trading in influence

Trading in influence is **also prohibited**, i.e. **giving, offering or promising to give any Advantage** to any person for the **purpose of abusing his actual or supposed influence** to obtain from a public authority or a Government Official a distinction, a job, a contract or any other favorable decision.

For example

Context of an administrative process: Instead of directly contacting the Government Official in charge of the amendment of the operating permit, a Verallia employee is offering an undue advantage to one of the Government Official's relative (e.g. a good friend) so that the latter can favorably influence the Government Official and secure, for Verallia, the granting of the amended operating permit.

✗ This is a case of **trading in influence**. You **shall not offer an Advantage** to a Government Official's relative for him to try to influence the decision of the Government Official.

RULES OF ACTION

Application of the Anti-bribery Code of conduct



Gifts & invitations

Gifts or invitations granted or received to obtain an undue advantage constitute a form of corruption. This practice is prohibited at Verallia.

Definition

This definition applies to all Business *Gifts* offered and/or received in the course of the Group's activities. It therefore concerns *Gifts* given **to external third-party** (e.g. customers, suppliers or other service providers), as well as those received by **employees** or **corporate officers** of Group companies.

A "gift" refers to any valuable material object (e.g. *paperweight, office furniture...*) or food *gift* (e.g. *chocolate box, bottle of champagne...*) offered or received for no payment.

An "invitation" refers to any offer of accommodation, meal invitation, sports or cultural events, or any other valuable advantage enjoyed by the beneficiary for free.

Applicable rules and purpose

A gift or an invitation must be a gesture of pure courtesy as part of normal business relation.

Local practices may not take precedence over Verallia **Policy on Gifts and Invitations** (unless specific local derogation if any explicitly mentioned in the local procedure).

However, in specific circumstances, such gifts or invitations can be considered as undue advantage and associated to a **bribery act** if received from or offered to a third-party **in exchange of a favorable decision**. For this reason, Verallia has implemented specific rules, listed here below to secure the offering or reception of gifts and invitations by Verallia employees.

Principle of transparency

With the exception of group invitations (e.g. a cocktail party or general product presentation), any individual gift or invitation, given or received, exceeding a maximum threshold defined in the procedure by geographical area, must be declared in the dedicated software.

This maximum allowable threshold indicates **a ceiling, per person and per year**, for gifts or invitations **given to or received from the same third party** (natural or legal person). Above this limit, a prior authorization is required according to the rules defined in the related policy.

General rule

Therefore, it is prohibited to propose or offer, or receive, gifts and invitations:

- in excess of a low value;
- whose frequency is not limited; and
- that are not in line with a purely professional scope.



Further reading

"**Gifts and invitations**" policy, available on the Intranet – Verallia Group Compliance / Anti-corruption section or from the company's Human Resources Manager or on the Verallia website section Ethics and Compliance.



Application of the Anti-bribery Code of conduct

🔍 Rule

Specifically regarding Gifts and invitations offered to third parties:

- They cannot be included in an expense report; they must be purchased in compliance with the applicable purchasing procedures;
- They must be distributed according to an objective criterion;
- They must be offered only to persons directly involved in the business relationship with the company;
- In addition, the giving of Gifts or invitations to elected representatives, public authorities or administration agents or other Government Officials, may only be considered following the prior written express consent of the Division's CEO and/or the Division's General Counsel.

🔍 Rule

Specifically regarding Gifts and invitations received from third parties:

- They must be received at the professional address.
- No gifts from suppliers or potential suppliers/agents are acceptable in a consultation or negotiation phase.
- They should in general be pooled and shared between the members of the department or service concerned or given to a charity. Acceptance of invitation to sporting, cultural or other events is only acceptable by an employee if justified by a specific business interest for the company and if it is **previously authorized according to the rules in force** (see the **"Gifts and invitations" policy**).
- It is strictly forbidden for any Group employee to ask in any way whatsoever for a Gift or other favor from a business partner, whoever this may be.



If in doubt, discuss the matter with your company's Compliance Officer or your Division's Compliance Officer.

For example

You cannot offer to pay for a client's weekend in Paris, because this invitation is not in line with a purely professional scope.

You are one of the purchasers of our Company and a supplier invites you to attend the final match of a football tournament.

✗ **You cannot accept such an invitation without having first obtained written authorization according to the rules in force (see the "Gifts and invitations" policy).**



Conflict of interest

We take care to always act in the interest of Verallia and to report any confirmed or potential conflict of interest.

Definition

There is a conflict of interest when direct or indirect personal interests in the private life of an employee, officer and director of our Company are or may be in conflict with the interests of our Company and may, therefore, put the employee, officer and director in situation of not acting in the best interests of our Company. It may be direct or indirect personal interests of an employee, officer and director or of people close to them (spouse, friend, relative or person who has influence over him/her). The conflict can also arise from extra-professional relationships with customers, suppliers, partners or competitors of the Company, or other parties involved in economic or public life.

Applicable rules

🔍 Rule

To prevent and manage any risk of conflicts of interest, all employees, officers and directors of our Company must acknowledge the **“Conflicts of interest” policy**, which details in particular the main situations that run a risk of conflict of interest as well as the measures to take to avoid this risk.

🔍 Rule

When an employee, officer or director is or is likely to be in a situation that could lead to a conflict of interest, he must notify his immediate supervisor, the senior level of his line management and the Human Resources Manager of his company in writing. He must then agree to accept the decisions made, which, for example, may lead him to withdraw from a negotiation or a decision-making process and to be temporarily replaced.



Further reading

“Conflict of Interest” policy, available on the Intranet, Verallia Group Compliance / Anti-corruption section or from the company's Human Resources Manager or on the Verallia website section Ethics and Compliance.



[When in doubt](#)

For example

As a Client Manager, you are in charge of negotiating with a new client. Your cousin's wife is a purchaser at this business.

- ✗ You should not be in charge of this agreement insofar as there is a risk of conflict of interest. You might concede.
- ✓ In this case, you should approach your supervisor to inform him and to find a solution. If in doubt, discuss the matter with your company's Compliance Officer or, if not, your Division's Compliance Officer. Should the conflict of interest be confirmed, you need to ask for the prior written consent of the Group CSR Director & General Counsel. If you are eligible to an annual assessment *via* the internal HR management system, you should declare your conflict(s) of interest directly in your assessment form.



Use of an intermediary

We ensure all of those acting on our behalf is upholding the same standards of integrity and ethics as us.

Definition

“Intermediary” means any person acting with an entity or a person in the interest of another entity or person who has duly authorized him for such purpose, to obtain or facilitate the conclusion of a transaction for his principal.

For examples (not exhaustive): sales agents, distributors, customs brokers, consultants acting as intermediaries.

Applicable rules

Anti-bribery and anti-trading in influence laws, as well as this code prohibit any form of indirect corruption/trading in influence, which includes illicit acts performed through or by Intermediaries.

Our Company uses Intermediaries. Therefore, it needs to ensure that its standards of integrity and ethics are adhered to by those acting on its behalf. Our Company could be prosecuted for any act of bribery or trading in influence committed by an Intermediary.

Rule

Our Company has developed a **policy on “Commercial agents and other intermediaries and service providers”**, which must be applied in all of our relationships with Third Parties acting as intermediaries.

Rule

Use of an Intermediary without having first performed the due diligence established in this policy and signing an agreement is prohibited.

For example

You are looking for an Intermediary to promote a new product/client search in a new market/a new country and an agent who would be very effective is recommended to you. Because you have very short deadlines, you decide to call this agent right away. During this phone conversation, you learn that the agent has good contacts in the market, but does not have the necessary technical expertise or a robust infrastructure on the market. **Moreover, you do not have information about his reputation. Given the urgency and the lack of alternatives, you decide to give him this contract immediately.**

✗ Even if you are in an urgent situation, you should not use an Intermediary without having first followed the procedure established for this purpose (and in particular the performance of due diligence by sales management) and signing an agreement.

You have filed to obtain a new permit. The Government Official in charge of this permit gives you the contact details of an Intermediary who he says can help you get the permit more quickly.

✗ Here, the risk is that any amounts paid would correspond to a bribe indirectly paid to the Government Official. As a reminder, you should not use an Intermediary without first following the due diligence procedure and signing an agreement.



Further reading

“**Commercial agents and other intermediaries and service providers” policy**, available on the Intranet – Verallia Group Compliance / Anti-corruption section, or from your company’s Human Resources Manager.

→ When in doubt



Third-party due diligence

We must be vigilant about the integrity of third parties with whom we work, to protect Verallia's business and reputation.

Applicable rules

To secure the maintenance or the entry into business relationships with external third parties, Verallia implemented a **“Third party due diligence procedure”** establishing rules on the screening to be performed over third parties, with regard to the nature of third parties and profile of risk (e.g. agents and intermediaries, distributors, JV partners, beneficiaries of donations and sponsorships programs...).

If we are not sufficiently vigilant, Verallia may find itself involved, more or less directly, in corruption cases. **The risk for Verallia is legal, commercial and financial.** Its **image and reputation** can also be affected. It is therefore necessary to implement assessment procedures to ensure that our partners offer sufficient guarantees in terms of integrity.

In case you are interacting, in the context of your activities at Verallia, with external third parties considered by Verallia as being risky, ensure to comply with the principles of this procedure. Due diligences are to be performed, by using the available internal tools, on new and existing third parties in application of the due diligences plan deployed in each entity.

Note that if the third-party is identified at risk a negative decision (“NO GO”) may be taken preventing the business relationship from being maintained or entered into. Otherwise, the positive decision will be subject to the implementation of mitigation actions to reduce the risks.

Any relationship with a third-party is subject to proper monitoring and vigilance at all times. Any doubt or red flag during the relationship must be reported to be assessed. In any case, depending on the profile of the third-party, the assessment must be renewed on a recurrent basis to prevent any corruption risk.



For further guidance, please contact your Legal Department or the Group Compliance Department.



Further reading

“Third party due diligence procedure”, available on the Intranet – Verallia Group Compliance / Anti-corruption section.



When in doubt



Relationships with Government Officials

We maintain ethical relationships with Government Officials. They are subject to the rules set out in this Code and we ensure our relationships are objectively and directly motivated by genuine business reasons and supported by proper documentation.

Definition of lobbying

Lobbying can be defined as an action taken to influence the decisions of a government or an institution.

Some national laws make lobbying activities subject to certain requirements.

Applicable rules

Rule

To comply with these requirements, all employees, officers, and directors must obtain the agreement of your company's General Management and the Legal Department of the Group before engaging in any lobbying activity.

For example

If you wish to contact a Member of Parliament to discuss a law on glass recycling, this communication may be considered to have the purpose of influencing this decision and thus may constitute lobbying.

- ✓ As such, **you must obtain the authorization** of your company's General Management and the Legal Department of the Group before any steps in this direction.



Prohibition of “facilitating payments”

We strictly prohibit any payment made to Government Officials to ease or speed up an administrative process. We carry all of our activities upholding the best ethical standards and are especially vigilant with public officials.

Definition

“Facilitating payments” are defined as payments to a person made with the purpose of expediting or facilitating the performance by a Government Official **or the representative of an administration** of routine tasks.

Facilitating payments are typically of low value and made to – or demanded by – low-ranking Government Officials in order to induce them to perform their functions, such as:

- issuing licenses or granting permits that our Company, its employees, directors and officers have the right to receive,
- clear our goods through customs quickly,
- registering or acknowledging receipt of an application for an administrative procedure,
- providing police protection.

Applicable rules

🔍 Rule

Although the so-called “facilitating” payments may not be illegal and may be common business practice in some countries, **our Company prohibits payment, directly or indirectly, by its employees, officers and directors of such facilitating payments.**

Even in urgent situations, making such payments with the purpose of expediting or facilitating the decision-making process is strictly prohibited.

For example

“Facilitating payments” may include:

- unofficial payment of a sum of money to a foreign Government Official to obtain a K-bis extract or a visa more quickly,
- payment of a sum of money to a Government Official to thank him for his quick performance in customs clearance operations,
- payment of a small amount to an employee of an electricity company to have a power line put into service to power a site.



Patronage/donation and sponsoring

Based on our purpose “Re-imagine glass for a sustainable future, Patronage/donation and sponsoring operations should be given if it is aligned with this criterion:

➔ “Promote our products and/or a circular economy and/or social inclusion within Verallia’s local communities”

Definition

Patronage/donation and sponsoring are common actions conducted by companies in the course of their business to support charitable actions, cultural or sports events. Although, those actions are most of the time not questionable or illicit, patronage and sponsoring can be used in bribery schemes as a form of undue advantage provided to secure a favorable counterpart from the beneficiary.

Patronage is a material or financial support provided, without direct or indirect consideration from the beneficiary to a work or a legal entity for activities of general interest.

Sponsoring (or sponsorship) is a material support given to a statement, a person, a product or an organization in hopes of gaining a direct benefit. Sponsorship operations are intended to promote the image of the sponsor and include an indication of its name or its brand. The payment made by the Company does not constitute a donation, but rather compensation of the service provided by the partner organization.

Applicable rules

Any act of patronage is prohibited unless previously authorized in compliance with the rules set in the specific procedure.

Sponsoring (or sponsorship) is prohibited unless:

- Our Company receives actual and proportional consideration; and
- The sponsorship operation is previously authorized in compliance with the rules set in the specific procedure.

Our Company has developed a procedure on “donations and sponsorships”, which must be applied for all actions of donations and sponsorships performed in the context of Verallia’s activities.

Political and religious donations and contributions

Political donations and contributions are financial/cash or in-kind donations or contributions made, directly or indirectly, to a candidate for political office or to a political party or organization. In general, any form of funding of political parties or activities, directly or indirectly, even if permitted by local law, is prohibited.

Similarly, direct or indirect donations and contributions, made in cash or in-kind, to a religious organization or program are prohibited.

For example

Example of patronage/donation: Our Company, after authorization, commits to be a patron in a campaign to collect and recycle glass bottles to promote public awareness of the need to recycle.

Example of sponsoring: After authorization, our Company may pay funds to an organization to increase our Company’s notoriety as part of a sponsorship action.

✓ The consideration obtained must be reviewed to validate the sponsoring.



Further reading

“Donations and sponsorships” procedure, available on the Intranet – Verallia Group Compliance / Anti-corruption section, or from your company’s Human Resources Manager.

➔ When in doubt

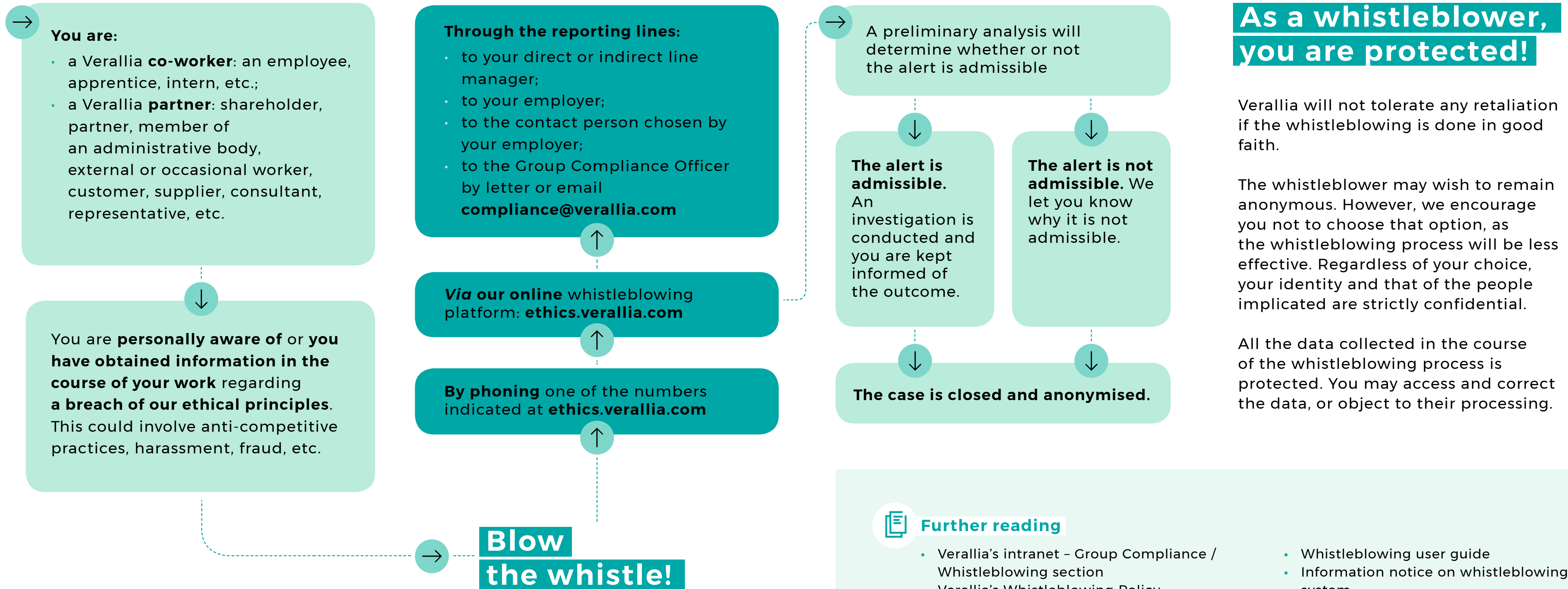
**How to use
this Anti-bribery
Code of conduct**



How to use this Anti-bribery Code of conduct

Whistleblowing system

Any violation of the rules of this code must be reported to Verallia so that measures can be taken to put an end to the violation and implement adequate corrective and preventive action can be taken by the Group to ensure the effectiveness of the anti-bribery program. We rely on each of you to report any breaches of our ethical principles.





How to use this Anti-bribery Code of conduct

Sanctions

Failure to comply with the prohibitions and obligations contained in this Anti-bribery Code of conduct represents a risk for both Verallia and its employees.

→ As Verallia employee, if you fail to comply with the principles set out in this Code of Ethics, you may be held personally responsible and face disciplinary sanctions.

General consequences

In any event, if Verallia or any of its employees were to be implicated or penalized for non-compliance, this would be likely to cause serious damage to the Group's reputation, particularly in the eyes of its clients, suppliers and other external stakeholders.

Disciplinary sanctions

As part of its zero-tolerance policy, Verallia also reserves the right to impose disciplinary sanctions in the event of a breach of the Anti-bribery Code of conduct by one of its employees*. Depending on the situation, these disciplinary sanctions may go as far as dismissal.

* In accordance with the provisions of the applicable law and/or rules of procedure of each entity.

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