

# Code of Conduct and Business Ethics Policy

## CODE OF CONDUCT AND BUSINESS ETHICS POLICY IMPLEMENTATION

TO ALL BERRY ASTRAPAK EMPLOYEES

As we make progress in “charting the new course” for our Company, one of the most important values or behaviours that we strive for is Integrity in all our dealings with our stakeholders both within and external to the Berry Astrapak Group.

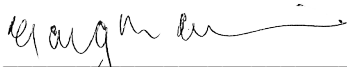
To support this endeavour, our Group in consultation with its Board of Directors has established the Code of Conduct and Business Ethics (“the Code”) to help everyone maintain the highest standards of ethical conduct. The Code does not cover every issue that may arise but sets out the basic principles and a methodology to help guide all of us in the attainment of this common goal.

Please read this document carefully and apply the principles stated in the course of your work. If you encounter a situation, that you believe may violate or lead to a violation of this Code, contact any of our Senior Managers or follow one of the processes set out in Section 6 of the Code, who will make every effort to assist or refer the matter to the appropriate Executive to provide the relevant guidance.

Our reputation is integral to our success, and reputation comes from our actions as we engage with each other on a continuous basis. Our overall performance should be consistent with the principles contained in the Code and any behaviour that does not support our Code should be eradicated at all cost.

I look forward to seeing all our Employees sign the Code to signify their commitment towards making our Company a place where integrity reigns.

Kind regards,

A handwritten signature in black ink, appearing to read "Craig Matthews".

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**Craig Matthews**  
Managing Director  
06 March 2023

<p>Date approved: 07 January 2022 Next Review date: 28 February 2023</p>	<p>Group MD Approval: 07 January 2022 Policy: <b>BERRY ASTRAPAK CODE OF CONDUCT &amp; BUSINESS ETHICS POLICY</b></p>
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## 1. INTRODUCTION

The Berry Astrapak Group of Companies including RPC Astrapak (Pty) Ltd, Astrapak Manufacturing Holdings (Pty) Ltd and their respective subsidiaries and affiliates (“Berry Astrapak” or “the Group”) is committed to the strictest standards of ethical conduct, fair dealing and integrity. To this end the Group has adopted a **Code of Conduct and Business Ethics (the “Code”)**, which the Group and all its Employees are expected to uphold in their dealings with all internal and external stakeholders.

Berry Astrapak complies with all laws, regulations and applicable standards in all jurisdictions in which it operates, and to the extent that this **Code** may conflict with the law in any jurisdiction, those laws will apply.

This Code shall be read together with the Berry Global Code of Business Ethics and applicable South African laws.

The **Code** serves as a guideline and is not intended to substitute sound personal judgement and inherent understanding of ethical conduct, which are qualities expected of all Employees.

## 2. APPLICABILITY

This **Code** is applicable to all Employees of Berry Astrapak, regardless of which operation or jurisdiction they are working in.

### 3. SOCIAL AND ETHICS COMMITTEE OVERSIGHT

The Group is required in terms of the Companies Act 2008 ('the Act') (Section 72(4) read together with regulation 43 of the Companies Regulations, 2011) to establish a Social and Ethics Committee.

Through its Social and Ethics Committee ("the Committee"), the Group ensures that it is a sustainable and ethical organisation. This is accomplished by achieving a net positive impact on the Group's marketplace, workplace, natural environment, and social environment, and operating in an ethical, corruption-free environment while actively and inclusively engaging with all its stakeholders.

The Committee reviews this **Code** from time to time and monitors the Group's performance against it.

The Committee meets at least quarterly.

The Committee has access to the Group's Directors, Employee and Officer's, records, facilities and resources, as required; to discharge its duties and responsibilities subject to the board approved process;

The Committee has the right to obtain independent professional advice at the Group's cost.

The Committee's primary responsibilities are to monitor the Group's activities, having regard to any relevant legislation, other legal requirements or prevailing codes of best practice, with regard to matters relating to:

- a) Social and economic development, including the Group's standing in terms of the goals and purposes of:
  - The 10 principles set out in the United Nations Global Compact Principles;
  - The OECD recommendations regarding corruption;
  - The Employment Equity Act; and
  - The Broad-Based Black Economic Empowerment Act;
- b) Good corporate citizenship, including the Group's:
  - Promotion of equality, prevention of all discrimination, and reduction of **corruption**;

- Contribution to development of the **communities** in which its activities are predominantly conducted or within which its products or services are predominantly marketed; and
  - Record of sponsorship, donations and charitable giving;
- c) The environment, health and public safety, including the impact of the Group's activities and of its products or services;
- d) Consumer relationships, including the Group's advertising, public relations and compliance with consumer protection laws; and
- e) Labour and employment, including:
- The Group's standing in terms of the International Labour Organisation Protocol on decent work and working conditions; and
  - The Group's employment relationships, and its contribution toward the educational development of its employees;
  - The Group's commitment to BBEE empowerment and equity plans;
  - To draw matters within its mandate to the attention of the Board as occasion requires; and
  - To report, through one of its members, to shareholders at the Group's annual general meeting on the matters within its mandate.
- f) Ensuring that the Group's ethics are managed effectively, including:
- Leadership demonstrating support for ethics throughout the Group;
  - A strategy for managing ethics that is informed by the risks the Group faces;
  - Ethical standards are articulated in a code of ethics and supporting policies.
- g) Other matters relating to sustainability, which are not covered in the points above.

#### 4. VALUES

In addition to the Berry Global core values of Partnerships, Excellence, Growth and Safety, Berry Astrapak has defined its own set of values. These are reviewed from time to time by Management in consultation with Employee representatives.

The current values are posted on Berry Astrapak website [www.rpc-astrapak.com](http://www.rpc-astrapak.com), internal communication platforms and notice boards around the Group.

All Employees are expected to behave in accordance with these values at all times.

## 5. DIVERSITY AND INCLUSION

Berry Astrapak recognises the importance of acknowledging the diversity, culture and identity of all Employees within the Group. Through the Berry Global diversity and inclusion network, the Company aims to ensure that all Employees feel valued, included, and an integral part of the company's success.

## 6. TIMEOUS AND ACCURATE DISSEMINATION OF INFORMATION

All Employees must ensure that Information is disseminated timeously and in a transparent, honest and accurate fashion to appropriate internal and external stakeholders.

## 7. REPORTING OF CONTRAVENTIONS AND BREACHES

In order to safeguard the future of Berry Astrapak as well as protect its reputation, all Employees and stakeholders are requested to report any deviations or breaches of this **Code** to the Group.

There are a variety of ways in which deviations or breaches can be reported, but the three recommended methods are:

### **TO A SENIOR MANAGER**

Advising a senior manager in the Group should be seen as the preferred method of reporting as it supports the ethos of Berry Astrapak. Preferably the individual, but alternatively the senior manager who has been advised of breach, should complete the Group's standard report form which can be found attached hereto under section 36.

### **TO BERRY ETHICS HELPLINE**

Where the individual reporting the breach wants to protect their anonymity, then Berry Ethics Helpline should be utilised.

Berry Ethics Helpline is a confidential service, which Berry Astrapak and many other companies have contracted with NAVEX to provide, specifically to ensure anonymity for "whistle-blowers".

All Tip-Offs are logged by the designated service provider and forwarded to respective senior management within the organisation for consideration and corrective action.

A register of all logged Tip-Offs will be retained by the Group HR Executive. Such Tip-Offs shall however remain anonymous.

Logged events shall be handled on an individual basis. The actions to be taken will be decided upon by the Senior Management and where appropriate by the Social & Ethics Committee. In particular, reported incidents involving Group Executives (including General Managers) shall be referred to and handled by the Social & Ethics Committee and to the Berry Group HR Business Partner.

A logged event will remain in an open status until the event/corrective action has been resolved satisfactorily, in which case the status of the file shall change to closed. This status can only be affected through approval by the Social & Ethics Committee.

The Group HR Executive is responsible for reporting on Tip-Offs to the Social & Ethics Committee.

**For further information please refer to the Berry Ethics Helpline document, or alternatively contact Berry Ethics Helpline on 080 099 7492 or <https://berryglobal.ethicspoint.com>**

Please note that Berry Ethics Helpline is not a service for the reporting of employment grievances or complaints. These must be directed through the appropriate Human Resource reporting channels.

## **PROTECTED DISCLOSURES AND RETALIATION**

Berry Astrapak prohibits all forms of retaliation against any Employee who reports any deviations or breaches of this Code.

In circumstances where a report amounts to a protected disclosure as defined in Section 1 of the Protected Disclosures Act 26 of 2000, no Employee making such protected disclosure may be subjected to any occupational detriment within the Group on account, or partly on account, of having done so.

## **8. AVAILABILITY OF FORMS AND DOCUMENTS**

All forms and documents referred to in this **Code** are available on the Berry Astrapak internal communication platforms or alternatively from the Group HR Executive or Company Secretary.



The following forms, which can be found attached hereto under section 36, should be utilised by Employees for declarations and deviations:

- Report of internal policy contraventions
- Gift declaration
- Declaration of interest
- Personal Compliance Certificate.

## 9. ILLEGAL, UNETHICAL AND UNACCEPTABLE BEHAVIOUR – INCLUDING CORRUPTION AND ANTI-COMPETITIVE BEHAVIOUR

Berry Astrapak adopts a zero-tolerance approach to illegal practices including fraud, corruption and money laundering, as well as unethical business practices and behaviour that in any way contravenes any law or regulation or the morals of society.

Berry Astrapak is committed to complying with the Prevention and Combating of Corrupt Activities Act 12 of 2004 and prohibits all form of money laundering activities including any monetary activities. Employees are encouraged to be vigilant and to report any suspicious transactions or activities in this regard.

Berry Astrapak supports the free market system and by extension, applicable competition laws and principles and does not tolerate anti-competitive behaviour such as collusion, price fixing and market sharing.

Berry Astrapak is committed to complying with the provisions of the Competition Act 89 of 1998 as well as the competition laws in every country where the Group does business. Berry Astrapak Employees are not permitted to:

- Discuss or enter into an agreement or understanding (whether written, spoken, or otherwise) that relates to a competitive matter;
- Participate in purchasing agreements (whether written, spoken, or otherwise) that restrict the resale price to buyers or allocate markets and territories;
- Discriminate in prices, terms, and services offered to similarly situated customers purchasing similar goods in like quantities on similar terms. Berry Personnel will comply with antitrust laws; or
- Bid rigging.

Furthermore Employees may not engage in conduct or practices that may be, or may be construed as being, harmful or prejudicial to the reputation of the Group.

Employees may not carry out any undesirable or unethical practices such as money lending on Berry Astrapak premises or during working hours or involving other Employees.

In accordance with Section 34 of the Prevention and Combating of Corrupt Activities Act 12 of 2004 corrupt or potentially corrupt transactions relating to the Group which amount to more than R100,000 in value are required to be reported to the relevant legal authorities.

## 10. INSIDER TRADING

Employees are prohibited from engaging in insider trading. This includes trading in company securities or sharing material, non-public information with others that gives them an unfair advantage. Examples of non-public material information include:

- Future material financial results;
- Anticipated material mergers, acquisitions and divestitures;
- Material new product development;
- Upcoming executive leadership changes;
- Pending material litigation.

## 11. CONFLICTS OF INTEREST

All Employees must avoid any conflict of interest that may unduly influence or compromise their ability to act in the best interests of the Group. Employees are obliged to disclose any potential conflicts of interest or to clarify uncertainty as to what may constitute a conflict of interest.

Examples of conflicts of interest that must be declared include:

- Any Employee engaging in any work outside of Berry Astrapak;
- Any Employee that has a direct family member employed by direct competing organisation;
- Any Employee that has a direct family member employed by a strategic supplier or customer;
- Any Employee that is a member of a professional body.

It should be noted that even where a disclosure of interest is approved, it does not then authorise an Employee to behave in a manner that conflicts with the interests of Berry Astrapak.

## 12. RELATIONSHIPS IN THE WORKPLACE

Employees have a right to privacy, but as soon as private relationships start having an impact on the business, the right to privacy becomes diluted. When a personal relationship has a negative effect on the operation of the business the company can interfere and take disciplinary steps.

If a relationship in the workplace affects the conduct or performance of those in question, this will be managed and dealt with in the same way as other conduct or performance related matters.

## 13. BRIBES, GIFTS, FAVOURS AND HOSPITALITY

Employees or their immediate family members may not directly or indirectly accept or offer any bribe or solicit payment, nor give or receive gifts, favours or hospitality that may unduly influence independent judgement and objectivity.

Employees are not permitted to offer or make facilitation payments (directly or indirectly using a third party) to any government officials for the purposes of securing or expediting routine governmental services including:

- Processing of licences, visas and general paperwork;
- Securing of permits;
- Connection of utilities; or
- Receipt of customs clearance.

All gifts and hospitality received from suppliers or clients need to be declared on the Gift Declaration form, which is attached hereto under section 36 or can be obtained from the Group HR Department.

The following rules will apply:

- No gifts of cash or cash equivalents (gift cards, coupons or vouchers) may be accepted;
- No gifts or hospitality can be accepted above R1500, unless approved by the relevant EXCO member;
- Any gifts or hospitality deemed at a value higher than R150 but less than R1500 needs to be declared, however do not require approval;
- Gifts or hospitality cannot be accepted or granted during tender or contract negotiations phases of any nature. This applies to both clients and suppliers.

Registers are maintained by the Group MD's secretary and are summarised and submitted quarterly to the Social & Ethics Committee after review by the Group FD.

Employees or their immediate family members should be careful not to accept any favours, which could be construed as gifts or hospitality. Where this occurs, the favour should be approved and disclosed in accordance with the above guidelines.

## 14. DEALINGS WITH SUPPLIERS AND CUSTOMERS

All Employees must maintain their independence from any entity or person with whom Berry Astrapak does business or has a relationship. Outside of normal share dealings on a listed stock exchange, no Employee may have a financial or commercial interest in any entity or person that deals or trades with Berry Astrapak.

No Employee may receive any benefit such as a gift, hospitality, favour, commission or kickback either directly or indirectly for facilitating a transaction involving Berry Astrapak in anyway. All Suppliers, as well as all Employees involved directly or indirectly with procurement and the nomination, auditing and management of suppliers, must ensure that they comply at all times with this **Code** as well as any specific Supplier Code of Conduct issued by Berry Astrapak from time to time. These **Codes** are available on the Berry Astrapak internal communication platforms. They will be issued to suppliers during the supplier approval process.

## 15. TRADE COMPLIANCE

Employees are required to comply with applicable laws and regulations governing international trade and other international transactions, including:

- Importation and exportation;
- Disclosures of technical data to foreign persons;
- Participation in boycotts;
- Employment of foreign nationals;
- Payments to government officials; or
- Sale of goods to governmental entities.

## 16. AUTHORITY LEVELS AND APPROVAL LIMITS

In accordance with good practice, various authority and approval limits have been delegated within the Group. Where appropriate these are reviewed from time to time by EXCO and the Board of Directors. A copy of the authority matrix is available on the Berry Astrapak internal communication platforms.

## 17. OUTSIDE EMPLOYMENT, DIRECTORSHIPS AND ACTIVITIES

No Employee may without approval:

- Take up employment on a part time or “after hours” basis either personally or with another entity.
- Hold shares in a close corporation or a private Company.
- Hold more than 1% of the shares in a listed Company.

Requests for approval must be submitted in writing to the relevant Managing Director or the Group HR. Executive for approval. The “Declaration of Interest” form is attached hereto under section 36.

The impact on an Employees work performance in carrying out their duties for Berry Astrapak will always be taken into account in deciding whether to approve an application or not.

Employees may not participate in external seminars and conferences without the permission of the Group MD.

## 18. REMUNERATION AND INCENTIVES

Remuneration is a private matter between the Group and the individual Employee. Employees should not disclose their remuneration to other Employees under any circumstances.

Employees’ personal records are considered personal information and are subject to the provisions of the Protection of Personal Information Act 4 of 2013. Anyone having access to personal records or acquiring access by accident will keep all such information strictly confidential and ensure that no unauthorised parties shall have access to it.

No Employee may set up or authorise or receive payment from any incentive or bonus scheme that has not been approved by the Group CEO or the Group MD or where appropriate the Group Remuneration Committee.

## 19. COMMUNICATION OF COMPANY INFORMATION

Only the Group CEO and Group MD and any person specifically authorised by them in writing may issue statements and comments to the media, analysts, and authorities - unless required by law - and the general public.

Any enquiries received by any Employee should be referred directly to one of the abovementioned personnel.

## 20. DATA PRIVACY

Berry Astrapak takes its obligations regarding privacy and data protection seriously. Employees shall respect the intellectual property and confidential information of third parties. Each Employee has an obligation to comply with Berry Astrapak's policies, contractual obligations, and all applicable privacy and data protection laws including the Protection of Personal Information Act 4 of 2013. Information shall only be collected for legitimate business purposes and care shall be taken to secure it. Additional information can be found in Berry Astrapak's Privacy Policy.

## 21. EMPLOYEE INFORMATION

Berry Astrapak believes in protecting Employee privacy. When the Group collects personal information from Employees, the Group follows the privacy principles of the Protection of Personal Information Act 4 of 2013. For further details please see the [Berry Astrapak Employee Privacy Policy](#).

Employees may access their information, ask questions about Berry Astrapak privacy practices or issue a complaint by contacting Berry Astrapak's Information Officer on [astrapakinformationofficer@berryglobal.com](mailto:astrapakinformationofficer@berryglobal.com).

## 22. CONFIDENTIALITY AND PRICE SENSITIVE INFORMATION

Just as the Group respects the right to privacy of its staff, so it expects that Employees will not disclose, remove or retain or use – either during their employment or after leaving the Group - any confidential information pertaining to the Group unless authorised or required by law to do so. An appropriate Confidentiality clause is included in the Group's Standard Contract of Employment.

This includes but is not limited to information about the Berry Astrapak's products, specifications, financial performance, strategies, customers, suppliers, pricing, processes and systems. Neither will an Employee that has access to, or accidentally acquires, confidential information about another Employee disclose such information to any third party or permit such information to be disclosed unless such disclosure is required by law.

No confidential information may be shared with third parties unless they have signed a non-disclosure agreement.

## 23. ELECTRONIC COMMUNICATION AND INTERNET USAGE

Berry Astrapak has a separate policy entitled “Berry Astrapak Electronic Communication and Internet Usage Policy” which provides guidance for all users on the following:

- Access to the Internet and Network facilities
- Limited Personal Use
- Confidential Information
- Electronic Mail
- General Prohibitions
- Privacy
- Consequences of Abuse

All Employees who have access to Berry Astrapak’s systems are responsible for ensuring that they are familiar with the contents and comply at all times. A copy of this policy is available on the Berry Astrapak internal communication platforms.

## 24. COMPANY FUNDS AND ASSETS

Employees must at all times ensure the safety of the Group’s funds and assets. They must only be utilised for legitimate Group business and recorded, handled and stored in accordance with Group policy and generally accepted business and accounting practice. Employees must ensure that Berry Astrapak receives appropriate value for any expenditure, which they incur on behalf of the Group.

No goods or services may be purchased for personal use with Group funds and no Group property or equipment may be used for private purposes without the authority of an EXCO member.

Any invention, patent or other intellectual property that arises out of an individual’s employment with Berry Astrapak and/or through the use of its facilities automatically becomes the property of Berry Astrapak.

All Employees who leave Berry Astrapak are required to return all Group owned assets and property on or before the date of their departure and should ensure that they obtain written confirmation from an appropriate Manager/Officer of the Group that they have done so. Any Employee who becomes aware or suspects that any unacceptable behaviour is taking place has a responsibility to report it in terms of this **Code** using one of the channels outlined in 7 above.

## 25. COMPANY RECORDS

Berry Astrapak is required by law to keep and retain complete and accurate books of account and records. Specific guidelines are set at Group, Divisional and Operational level and Management at each level is tasked with ensuring that they comply. A comprehensive policy is available from the Group FD.

## 26. FINES AND PENALTIES

Any fines and penalties which Employees incur for issues and behaviours which are within their control – even when on Group business – such as parking and speeding fines, will at all times be for the Employees account.

## 27. DONATIONS AND SPONSORSHIPS

No donations and sponsorships may be made without the approval of the Group CEO or Group MD.

Any donations and sponsorships considered should take account of the Group's Corporate Social Responsibility (CSI) objectives – particularly support for:

- Health, education and environmental initiatives.
- Voluntary and charitable organisations that solve community problems.

No donations or sponsorships may be made to political parties or associations.

A schedule of all donations and sponsorships will be submitted quarterly to the Group Social and Ethics Committee for review.

## 28. HEALTH AND SAFETY

Berry Astrapak takes the Health and Safety of its Employees very seriously and views it as integral to the operation of the Company. All Employees have a responsibility to adhere to the Company's Health and Safety policies in force from time to time. This includes the timeous reporting, investigation and implementation of corrective actions following an accident or incident.

Failure to do so could result in disciplinary action being taken.

Where appropriate, Employees are delegated authority and responsibility in writing at Group, Divisional and Operational level to manage Health and Safety.

Management are responsible for ensuring that adequate financial and human resources are allocated to address these matters.



Copies of the Company's policies and procedures are available on the Berry Astrapak internal communication platforms.

## 29. HARASSMENT

The Group has a zero-tolerance approach to harassment.

Where an Employee feels that they are being harassed or coerced into performing an action or activity that is illegal or conflicts with this **Code**, their beliefs or generally accepted behaviour, they should immediately report as detailed in section 7 above.

More specifically the Group does not tolerate any form of harassment and has a specific policy in this regard, which is available on the Berry Astrapak internal communication platforms.

## 30. DRUGS AND ALCOHOL

Drugs (*excluding pre-approved scheduled medication taken in accordance with a doctor's prescription* - *In those instances, medical documents are to be presented to the employees Line Manager prior to taking them to work to enable the company to seek medical advice on whether the prescribed drug is safe to take whilst working in a manufacturing environment and to ensure compliance with company policy as well as Health & Safety Regulations*) and alcohol in the workplace can pose a significant threat to both the individual involved as well as other Employees and the assets of the Group and therefore are not allowed on the premises. No Employee may enter any Berry Astrapak premises while under the influence of drugs or alcohol or when their "tested levels" exceed legal limits. The Group reserves the right to implement or conduct tests as it deems appropriate and Employees consent to undergo the tests.

Failure to do so could result in disciplinary action being taken.

## 31. DRESS CODE

All Employees are required to comply with the Group's dress code as applicable from time to time.

A copy is available on the Berry Astrapak internal communication platforms.

## 32. BROAD-BASED BLACK EMPOWERMENT AND EQUITY PLANS

Berry Astrapak supports the concept of Broad-Based Black Empowerment in South Africa. The Group's latest Rating Certificate is available on its website [www.rpc-astrapak.com](http://www.rpc-astrapak.com). Berry Astrapak prepares and submits its Employment Equity Plan to the Department of Labour annually.

The Group is continually striving to improve both its BBBEE rating and its Employment Equity profile. Performance in both areas is monitored regularly by the Group Social and Ethics Committee. A report on the Group's performance and status for the previous year is included in the Sustainability Report in the Annual Report. An electronic version of the report is available on the website [www.rpc-astrapak.com](http://www.rpc-astrapak.com).

### 33.SUSTAINABILITY AND THE KING IV CODE OF GOVERNANCE

Berry Astrapak supports and is working toward the implementation of the King IV Code of Governance Principles (King IV) and ensuring that the necessary social, environmental and economic values are fully embedded into the Group.

In addition, the Group strives to adhere to the 10 Principles set out in the UN Global Compact.

Berry Astrapak is committed to the principles of sustainable development, which entails achieving the optimal balance between social, economic and environmental progress and development in consultation with all stakeholders.

Berry Astrapak will endeavour to ensure that all third parties with whom they transact adopt similar principles in their businesses.

Where economically and practically possible, Berry Astrapak will seek to obtain external certification or accreditation to provide comfort and evidence that the Group is compliant with best practice.

#### **SOCIAL**

Social sustainability encompasses human rights, labour rights and corporate governance. This **Code** along with Group policy, Employee contracts of employment and the Sustainability Report set out the Group's guidelines and performance in this regard. There are a number of important principles, which underpin Berry Astrapak's commitment:

- Ensuring compliance with the 10 Principles of the UN Global Compact, as well as Human Rights and Labour Law at all times;
- A safe and healthy workplace;
- Adoption of fair labour practices and the promotion of equality;
- Prohibition of discrimination and harassment and the use of child labour;
- Right to freedom of association;
- Recognition of cultural sensitivities;
- Respect and confidentiality of personal information;

- Universal access and application of the Group's Grievance and Disciplinary policies;
- Delivering on commitments and targets incorporated in the Company's B-BBEE scorecards and Equity plans;
- Advice and counselling on health and hygiene.

## **ENVIRONMENTAL**

Berry Astrapak acknowledges that its activities have an effect on the environment, and monitors and reports its performance against the Global Reporting Initiative (GRI) environmental indicators and recognises the need to:

- Consider environmental impact in all decision-making and strategic planning;
- Develop and manage appropriate strategies at Group, Divisional and Operational levels;
- Reduce consumption of natural resources;
- Minimise environmental impact;
- Increase product value and benefits;
- Maximise re-use, recycling and recovery.

The Group participates in a number of industry initiatives, details of which are included in the Sustainability Report.

## **ECONOMIC**

RPC Astrapak's economic sustainability is driven by its risk management and future cash flows, which must be sufficient to support growth and investment.

As a result, the Group has implemented a comprehensive risk management program as well as a regular cycle of preparing, reviewing and reporting long term and short-term forecasts.

## **34.ACCREDITATIONS**

Berry Astrapak believes that accreditations from external authorities provide assurance to all stakeholders regarding the processes and standards, which the Group meets. The Group therefore continually seeks to attain and maintain appropriate accreditations such as ISO, BRC, HACCP and FSSC in its all its operations. Details are available on the website [www.rpc-astrapak.com](http://www.rpc-astrapak.com).

## 35.CONTRAVENTIONS OF THIS CODE

All Employees are required to familiarise themselves with the content of this **Code** and to ensure that they fully understand the behaviours expected from them. Ignorance is not an acceptable excuse.

Berry Astrapak views the failure to comply with, or acting in contravention of, the **Code** as a serious matter and a serious breach of an Employee's duties towards the Group and may seek disciplinary and/or legal action as appropriate in the circumstances.

## 36.STANDARD FORMS

### **FORM 1**

Report of Internal Policy Contraventions

### **FORM 2**

Gift Declaration

### **FORM 3**

Declaration of Interest

### **FORM 4**

Personal Compliance Certificate

**FORM 1**

**REPORT OF INTERNAL POLICY CONTRAVENTIONS**

**Reporter:**

NAME: \_\_\_\_\_ SURNAME: \_\_\_\_\_

JOB TITLE: \_\_\_\_\_ DIVISION: \_\_\_\_\_

**Employee being reported:**

NAME: \_\_\_\_\_ SURNAME: \_\_\_\_\_

JOB TITLE: \_\_\_\_\_ DIVISION: \_\_\_\_\_

DETAILS OF INCIDENT: \_\_\_\_\_

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ACTIONS (MANANGEMENT): \_\_\_\_\_

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SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_

**FORM 2  
GIFT DECLARATION**

NAME: \_\_\_\_\_ SURNAME: \_\_\_\_\_

JOB TITLE: \_\_\_\_\_ DIVISION: \_\_\_\_\_

MANAGER: \_\_\_\_\_

Company/Individual received from: \_\_\_\_\_

Contact details of Company/Individual gift received from: \_\_\_\_\_

NATURE OF GIFT: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

SIGNED: \_\_\_\_\_

DATE: \_\_\_\_\_

(Employee)

SIGNED: \_\_\_\_\_

DATE: \_\_\_\_\_

(Management)

### FORM 3

#### DECLARATION OF INTEREST

NAME: \_\_\_\_\_

SURNAME: \_\_\_\_\_

IDENTITY NO.: \_\_\_\_\_

NATIONALITY: \_\_\_\_\_

OCCUPATION: \_\_\_\_\_

COMPANY: \_\_\_\_\_

RES ADDRESS: \_\_\_\_\_

\_\_\_\_\_

BUS ADDRESS: \_\_\_\_\_

\_\_\_\_\_

POSTAL ADDRESS: \_\_\_\_\_

\_\_\_\_\_

Company Name	Reg: Number	Reg: Address	Office Held	Shareholding

OTHER: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

I hereby declare that:

1. The nature and extent of my interest in the above-mentioned Company(ies) is as stated; and
2. I have no other interests to disclose;

and accordingly request that this be regarded as a disclosure of interests for the purpose of section 75 of Companies Act 71 of 2008.

SIGNED: \_\_\_\_\_

DATE: \_\_\_\_\_

## FORM 4

### PERSONAL COMPLIANCE CERTIFICATE

#### CODE OF CONDUCT AND BUSINESS ETHICS POLICY

I \_\_\_\_\_ hereby confirm that I have:

1. Received a full copy of the Berry Astrapak “Code of Conduct and Business Ethics Policy”.
2. Read and understood the contents thereof.
3. Been advised to contact my Manager, the HR Department or the Company Secretary should I have any queries or questions regarding said document.
4. Understood the various communication channels set out in Section 6 of the *Code*, which I can use to report contraventions and breaches thereof.

By my signature below, I therefore confirm that I agree to fully comply with the *Code* and understand that any contraventions on my part will be subject to the sanctions set out herein.

SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_