

## **SIGNODE Human Rights Policy**

Signode Industrial Group, a collection of legal entities including their business units that are parent companies, subsidiaries, so-called brother/sister concerns, affiliates or joint ventures of each other and operate collectively in the global industrial packaging business segment under the common umbrella “Signode Industrial Group” or the “Transit Packaging Division” of Crown Holdings, Inc. (collectively, “SIGNODE”), aims to maintain the highest standards of ethics and employee rights. This means that we respect and, where necessary, protect the fundamental human rights of all our employees<sup>1</sup>, and seek to secure the fundamental human rights of our stakeholders, wherever they may be.

The purpose of this policy is to provide guidance on protecting the fundamental human rights of our employees, temporaries, subcontractors and suppliers.

The principles set forth herein are informed by the [UN Universal Declaration of Human Rights](#), the Fundamental Principles and Rights at Work from [International Labour Organization](#) (ILO), [The United Nations Global Compact Guiding Principles](#) and the relevant legislation in each country in which we operate.

Signode’s Human Rights Policy applies to all employees, directors and officers of Signode and its affiliates worldwide. The purpose of this policy is to guide Signode management and support employees to achieve the goals described above. In addition, third-party contractors working at Signode’s premises are expected to comply with this policy.

Our responsibilities include but are not limited to our operating sites and offices in the countries where we operate. In the vast majority of countries, employee rights are adequately covered by local legislation. In these countries, we often strive to set higher standards for employee human rights, consistent with our strategic vision. In countries where the legislation does not address the basic human rights principles that inform Signode’s conduct, we aim to offer the same level of protection as is afforded elsewhere in our operations, while recognizing that policies may need to take account of local culture, conditions and regulations. Where national law and international human rights standards differ, we will follow the higher standards to the extent it is legal to do so; where they are in conflict, we will adhere to national law, while seeking ways to respect employee human rights in line with our strategic vision.

Signode promotes the approach described above with its third-party contractors and suppliers through its [Supplier Code of Conduct](#), which compels them to commit to following a set of principles that reinforces the ones set forth in this Policy. We commit to implementing due diligence processes with our third-party contractors and supplier within our supply chains to avoid indirectly benefitting from or promoting any breaches of national laws or international human rights standards.

Signode recognizes that its presence has an impact on the communities in which it operates. We are committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives. Signode works to identify, prevent and mitigate adverse human rights impacts caused by our business activities through human rights due diligence and preventive compliance processes.

### **Safe working conditions are paramount**

Our long-term vision with respect to health, safety and environment is: no workplace accidents, no harm to people and no damage to the environment.

The safety and the health of our employees, third-party contractors and suppliers are paramount. Our overarching goal is to protect them against risk of harm and to ensure their mental and physical well-

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<sup>1</sup> As used in this Policy, the term “employee” applies both to permanent and temporary employees

being at our operating sites and in our offices.

We are committed to using sustainable environmental, health and safety practices and complying with all applicable laws, regulations and company standards in the countries where we operate. This is endorsed by the health and safety standards of our Signode's [Statement of Principles of Conduct](#).

We constantly work to ensure that our employees understand the critical role that they play in their own safety and that of their fellow employees. We are committed to engaging with them continuously to improve health and safety at our operating sites and offices.

Where living accommodation and/or eating facilities are provided we insist that the premises are kept safe and hygienic and meet the basic human needs of our employees, including their needs for shared leisure areas and facilities.

### **Employment is freely chosen**

We would never directly or indirectly force employees to work for us against their will, nor would we buy from or sell to any organization known to condone forced labor.

[Signode's Modern Slavery Statement](#) has been published on Signode's website at [www.Signode.com](http://www.Signode.com) under "Governance." This statement aligns with the relevant legislation on the subject, including the UK Modern Slavery Act 2015 and other similar legislation. This statement sets out the steps taken by Signode to ensure that human trafficking and all forms of modern slavery do not occur in our operations and supply chains.

### **Child Labor shall not be used**

We would never recruit child labor (as per ILO Labour standards), nor would we buy from or sell to any organization known to condone such practices. Young persons under 18 shall neither be employed at night, nor in hazardous conditions.

Through our Supplier Code of Conduct, Signode works in collaboration with third-party contractors and suppliers to prevent and prohibit any use of child labor under the legal working age.

### **Freedom of association and the right to collective bargaining are respected**

We respect the rights of our employees to join or form trade unions and to bargain collectively. We equally respect the rights of our employees not to join trade unions and will protect them against intimidation, harassment and discrimination in the same way.

Where the rights of employee representatives are set out in national law we respect the law and commit to maintaining a constructive dialogue with them. Signode is committed to bargaining in good faith with such chosen representatives of its employees and within the appropriate national legal frameworks.

### **Regular employment is provided**

All our employees, be they full-time, part-time or temporary, work pursuant to a regular pattern or patterns defined in their working conditions, or collective agreements, as applicable.

### **Working hours are not excessive**

Basic and over-time working hours comply with applicable laws, regulations, collective bargaining agreements, and are based on international labor standards.

In all cases, appropriate overtime rates are paid. We comply with applicable laws and regulations

intended to protect employees against exploitation in terms of working hours.

### **Our wages address market demands**

We recognize that, in most locations, the market dictates wage levels above the legal minimum. However, we are committed to ensuring that in all cases the wage paid meets or exceeds minimum legal requirements, through collective bargaining agreements where applicable.

We ensure that employees understand their wages and benefits both before being employed and during employment. We do not permit deductions from wages (for hours worked) for disciplinary reasons.

### **No discrimination is permitted**

Signode treats all employees and third-party contractors with fairness, respect and dignity. Signode is determined to maintain a work environment which is free from all forms of unlawful employment discrimination based on race, color, sex, gender, national or social origin, ancestry, nationality, citizenship, religion, age, gender identity or expression, sexual orientation, physical or mental disability, political opinion or any other characteristic as defined by the applicable law.

We do not tolerate any form of abuse or harassment, be it physical, sexual or verbal. This includes actions that can reasonably be considered as offensive, intimidating or discriminatory.

We expect those we work with to behave and act according to our corporate culture, with our sense of fairness and equal opportunity.

It is also Signode's policy not to discriminate against any applicants for employment on any of the bases described above.

### **Equal opportunity is offered**

We value and encourage the contribution of our employees, whether individual or collective. We believe a diverse workforce and an inclusive working environment benefits our business, our organization and our people.

Therefore Signode is committed to offering equality of opportunity when hiring, developing, compensating or considering individuals for promotion, termination or retirement, without discrimination. Signode's decisions rely on qualifications, skills, performance and experience.

### **Open dialogue with local communities is favored**

Signode seeks to foster an open dialogue with local communities. Where people in local communities may be affected by our activities, we seek to identify adverse human rights impacts of those activities and take appropriate steps to avoid and/or mitigate them. To support this, we provide guidance to our businesses on engaging with local stakeholders and managing the process of receiving and responding to community complaints.

Signode respects the rights of Indigenous People as defined by applicable laws and international human rights standards.

### **Use of conflict minerals is avoided**

In its efforts to promote Human Rights where it can and to operate in compliance with applicable laws, Signode has issued a [Conflict Minerals Policy](#). In accordance with this policy, the Company aims to avoid the use of conflict minerals in the manufacture of its products and is committed to complying with its reporting obligations.

## **Rights and responsibilities**

Signode senior executives have endorsed this Policy and are responsible for promoting it at all of our locations. Senior executives of Signode advise the senior executives of our ultimate parent company Crown Holdings, Inc. for reference to the Crown Board of Directors at least annually on salient compliance risks related to this policy at Signode.

Signode works to ensure that all employees and third-party contractors are informed, understand and put this policy into practice in the scope of their duties. Alongside regular communication, managers and employees will receive relevant training on how to implement this Policy in their day-to-day jobs.

We will make sure it is well-publicized together with our other Company policies, notably the [Statement of Principles of Conduct](#) and [Supplier Code of Conduct](#) as well as facility-level policies and procedures to follow in case of employee grievances. These policies are aligned with general principles set forth in this Human Rights Policy.

The above implies rights and responsibilities for employees. If an employee becomes aware of human rights abuses within our operations or supply chain, there are six ways to report it : (1) to a supervisor; (2) to the plant manager or the equivalent;(3) to the Business HR Director or (4) the SVP, Global HR or (5) to Signode's General Counsel, without fear of reprisal or of breach of confidentiality (if feasible and legally permissible); or (6) via Signode's Ethics and Compliance website/portal ([www.SIGhelpline.ethicspoint.com](http://www.SIGhelpline.ethicspoint.com)) or by telephone 1-855-866-2925 (in the US/Canada) or visit [www.signode.com/suppliers](http://www.signode.com/suppliers) for a list of international telephone number options. Local communities or external business associates, such as Signode suppliers, third-party contractors or Customer, may also report potential violations to the Ethics and Compliance website or helpline.

Signode will take appropriate action against third-party contractors, suppliers, customers or business associates who violate this Policy. Where third parties fail to honor their obligations hereunder, Signode may terminate contractual relations, demand the removal of certain personnel from Signode locations or invoke other contractual rights.

## **Review and monitoring**

Signode will periodically review the Policy and amend to respond to changes in legislation and best practices in an effort to improve its effectiveness.

The review includes the participation by Signode's most senior managers in the following functions: Human Resources and Legal Risk Management in consultation with Signode's President.

This Policy is available in all prevailing languages where Signode facilities are located.