



January 5th 2015

To our stakeholders:

I am pleased to confirm that Ceisa Packaging reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Arthur Lepage", is written over a faint, light-colored rectangular stamp or watermark.

Arthur LEPAGE

President Ceisa Packaging



Ceisa Packaging – Corporate Social Responsibility (CSR) Standards

Introduction

Doing business the right way has always been the Ceisa Packaging way. It is part of our heritage and guides our collective journey to becoming a top performing global packaging supplier. We have a responsibility to ourselves, our employees, the communities we live in, the suppliers we work with, the customers we serve, to always strive towards doing the right thing.

Sustainable Procurement is the process whereby economic development, social development and environmental protection are balanced with commercial needs of a business for quality, reliability, innovation and value for money. We see this as an essential and efficient business practice which is integral to the way we work. Our ambition is to strive towards adopting best practice standards and techniques and expect to work with our key customers and suppliers who do the same.

This document sets out our minimum compliance standards. We expect to work with our employees, customers and suppliers towards these minimum standards, and we will strive to consistently improve standards together and achieve excellence.

Where the use of sub-contractors or other third party organizations has been permitted, we expect our suppliers to implement the commitments set in this document throughout their supply chain including sub-contractors.

Our Commitment

We are committed to an ethical and sustainable business and supply chain and to manage the supply of goods and services in a responsible way by adopting a risk and opportunities based approach to identify our priorities.

Our key areas of focus are:

- Environmental Sustainability
- Social and Economic Sustainability, including:
 - Ethical business practices
 - Employment Standards
 - Community Responsibilities
 - Commercial Standards

We are committed to working internally and with our supplier base to ensure that we are both:

- fully compliant with all applicable foreign, national, regional and local laws, rules, regulations and legislation.
- satisfying the needs of our business around quality, reliability, innovation and value for money.
- assessing sustainability risks and identifying opportunities for improvement and innovation.
- collaborating on continuous improvement.

Environmental Sustainability

We aim at internally and expect our suppliers and all members of our supply chain to make every effort to limit the environmental impact of business operations and to have appropriate programs in place to help achieve this objective. We expect suppliers to have in place effective environmental management systems that are appropriate for the nature and scale of their business and that they identify and mitigate environmental risks.

We aim at on our day to day operations and also expect our suppliers as a minimum requirement to:

- Efficiently use available resources to minimize or mitigate environmental impacts.
- Seek to reduce carbon emissions, discharges, waste and use of water and energy.
- Comply with local and national environmental laws, and show sensitivity to environmental issues that may impact local communities.

Our goals and commitments:

Energy:

- Fully exploit opportunities for energy optimization and efficiency.
- Use clean and low energy sources.
- Use whole life cycle costing for energy, in categories that influence our energy use.
- Where relevant, this may include products rated in accordance to recognized standards.

Emissions to Air

- Work collaboratively with us to reduce emissions to air.
- Provide information on carbon emissions associated with the manufacture and supply of products and services, including those associated with their production, storage, transportation, use and ultimate disposal or recycling. We may request this information in tender documentation and it may influence decisions made during the procurement process.
- Provide information on the embedded carbon associated with the products and services provided, as necessary and where known.

Natural Resources

- Give priority to secondary materials (reused or recycled) where they offer equal or greater value for money and do not compromise quality or food safety standards.
- Provide information on recycled content and recyclability, and exploit opportunities to increase such levels where appropriate.
- Where it is unavoidable to use products derived from natural resources, we expect suppliers to comply with appropriate national, regional, local and international laws and standards.
- Secure legally and sustainably sourced timber and timber products.
- Support and comply with our Packaging or Agricultural Brewing Ingredients policies where applicable.

Biodiversity

- Produce biodiversity action plans for high risk first tier categories.
- Demonstrate compliance with good practice in habitat management for those suppliers whose activities significantly impact species or habits.

Water

- Quantify the water consumption of product or services provided and demonstrate how they will exploit opportunities to reduce this over time, in categories that give rise to water consumption in our operations.
- Have water risk assessments and to be able to demonstrate compliance with any risk mitigation activities specified for categories of supply that are sourced from areas of water stress.

Waste

- Be fully compliant with applicable national, regional, local and international waste laws, rules and regulations.
- Work with us to reduce the waste arising at our sites, and where wastes cannot be eliminated, work to ensure the waste has alternatives to land fill for disposal.

- Where practicable, all products and their packaging will be able to be reused, recycled or recovered by locally commonly available methods.

Pollution

- Be able to demonstrate legal compliance and good practice in the management of pollution to land, air or water during the operation of our business.

Social and Economic Sustainability

Employment Practices

Equal Opportunity

We will ensure that there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, sex, color, national or social origin, religion, age, disability, sexual orientation or any other status protected by applicable laws in the jurisdictions in which supplier operates. A fundamental aim is to ensure a diverse and representative workforce profile through promotion of employment equality. Suppliers will observe applicable national, regional and local laws, rules and regulations relative to discrimination.

Freedom of Association

We are committed to respect our employee's right to join, form or not to join a labor union. Suppliers are expected to respect the same principles and where their employees are represented by a legally recognized union, they should commit to establishing a constructive dialogue and bargaining in good faith with their freely chosen representatives.

Grievance Procedures

We will (and our suppliers) have fully documented grievance procedures and to have communicated their existence and availability to their staff.

Working hours and Remuneration

We will ensure to have working hours comply with applicable laws and to benchmark industry standards, whichever affords greater protection to their employees. Our suppliers must also compensate all employees fairly with wages, overtime premiums, and benefits relative to industry and country laws.

Freedom of movement by employees

- staff and workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.
- Our Suppliers are expected to publicly disclose the locations of all manufacturing and processing sites globally.

Child Labor

- We will ensure that no child labor is recruited and that children or young persons outside of legal working age will not be employed at night or in hazardous conditions at our sites and also at our suppliers' sites.
- These policies and procedures will conform to the provisions of the relevant International Labor Organization ("ILO") standards.

Bullying and harassment

We consider all aspects of harassment and bullying unacceptable and expect all our suppliers to remove any such actions or attitudes in their workplace.

Healthy and safe working conditions

- We will comply and also ask our suppliers to have, and comply with, internal health and safety policies and procedures and applicable foreign, national, regional and local laws, rules and regulations to ensure a safe working environment. This process involves the effective application of environmental, health and safety management and monitoring systems.
- We will work continuously to maximize the physical security of their employees wherever they are employed.
- We will ensure that our standards and policies are understood and training will be provided so that all employees understand the health, safety and security issues and requirements concerning their job/position.

Community Responsibilities

Economic Sustainability

We value the economic sustainability of our supply chain. We expect our suppliers to share in that philosophy when dealing with their supply chain. At a minimum we expect our suppliers to deploy a consistent and ethical standard by which contracts are awarded with respect to products and services for Ceisa Packaging, taking into consideration a wide array of social, environmental and economic impacts on the communities in which they operate or source from. We expect our suppliers working at or near our operations to have plans in place to minimize any disruption to their local communities caused by their activities and to demonstrate compliance with those plans. We will commit to these goals wherever we have manufacturing sites.

Ethical Business Practices

Ceisa Packaging expects the highest standard of conduct. Our standards set forth fundamental principles and policies to which all of our employees and our suppliers are expected to adhere. Ceisa packaging will always strive to treat our employees, business partners and suppliers ethically, honestly and fairly.

Commercial Standards

Payments, Loans, Entertainment and Gifts

Our policy on gifts and entertainment is clear – no gift, favor or entertainment is required to conduct business with Ceisa Packaging. Suppliers are expected to refrain from providing any payments, loan, service, gratuity, gift, personal travel or other favors of more than nominal value to any Ceisa Packaging representative. We will also avoid any such gift, favor or entertainment towards our customers.

Commercial Bribes, Political Donations, Charitable Contributions

We will follow applicable anti-bribery and corruption laws, including, for example, the United States Foreign Corrupt Practices Act or the United Kingdom Bribery Act. These laws prohibit promising, offering or making any payment of money, products or services to anyone in exchange for favorable treatment. Additionally, no supplier is allowed to make any such payments for, or on behalf of Ceisa Packaging.

Conflict of Interest

Any supplier may be ineligible to do business with Ceisa Packaging if any of our employees own a substantial interest in the supplier's organization or has a close personal relationship with a key person in the supplier organization. Prompt disclosure of any such relationship is required by all suppliers.

Use and Protection of Ceisa Packaging Assets

Ceisa Packaging looks to our suppliers and customers to safeguard both our tangible (i.e. money, physical assets) and intangible assets (i.e. intellectual property, information). We expect our suppliers and customers to keep our confidential information secure and avoid discussions of confidential information in public places. The obligation to retain and preserve confidential information may be ongoing and span beyond the years of contractual agreement with the supplier. Our contracts provide clear guidelines related to submission of business related expenses. All business expenses must be reasonable and supported by valid receipts where required under the agreement. Suppliers may be asked to sign a Non-Disclosure Agreement as part of our contractual relationship.

Insider Trading

Our employees are prohibited from purchasing, selling or otherwise trading securities while in possession of material, non-public information.

Use of Software

Our suppliers are expected to refrain from engaging in unauthorized duplication of any software owned or licensed by Ceisa Packaging.

Communication

Our suppliers are expected to communicate these standards to their employees, contractors and business partners in writing and ensure that they are followed.

Sourcing Policy

Ceisa Packaging is committed to sourcing from suppliers that embrace our sustainability and quality standards. We have a wide and diverse range of suppliers, and achieving these standards presents unique challenges in different parts of the world. However, we are committed to engaging with our suppliers and to work with them to recognize and adopt the following six pillars:

- Comply with our quality specifications.
- Strive to maintain soil fertility, water resources, air quality and biodiversity.
- Manage natural resources in an efficient manner throughout the lifecycle of the products, based on the 5R's - Reduce, Reuse, Recycle, Repurpose, and Rethink.
- Recognize the importance of supplier accreditation and where established, adopt accreditation to appropriate assurance programs.
- Meet food safety guidelines and traceability specifications.
- Understand and address any future guidelines, best practice, and legislative changes that may arise.

While some of these pillars are not in place in all regions, Ceisa Packaging will work to continually improve across our global operation.

How we work with our suppliers

As a global company, we recognize that we have a wide and diverse range of suppliers, and that achieving these standards presents unique challenges in different parts of the world. With this in mind we have developed a comprehensive but flexible 4 stage process for identifying assessing and managing risk as it relates to Sustainable Procurement.

Stage 1 - Screening

- We will conduct an initial screening of our current supplier base by considering risk, opportunity for change, and magnitude of impact, segmenting by supply category. Screening will focus on: energy use, emissions to air, natural resources, biodiversity, water, waste, pollution, and labor practices, ethics and regulatory compliance.

Stage 2 - Qualification

- During the tendering process, suppliers will be requested to provide data and comments on those areas of concern for that specific category area, as raised in Stage 1.

Stage 3 – Supplier Development

- Successfully-appointed suppliers or business partners will be provided with further support and guidance, enabling improvements against these standards as the business relationship develops.

Stage 4 - Audit

- Suppliers who are identified to represent the highest potential risk may be audited to ensure that the minimum expectations contained within this document are being applied to their business operations and supply chains, and that risks are being mitigated.
- All suppliers and members of the supply chain are expected to provide information to us about a product or service's social, environmental and ethical credentials. If we consider that any information provided warrants further investigation, the preferred course of action would be to commission an independent auditor to examine the information provided, at the expense of the supplier or supply chain member.

Management Systems

Where deemed necessary, suppliers shall use management systems to facilitate continual improvement and compliance with the expectations of these standards. This is determined by the size and activities of the supplier, along with the sustainability related risks derived from our analysis and audit process. The management systems shall include:

Commitment to Accountability: Suppliers must demonstrate commitment to the concepts described in this document by allocating appropriate resources and defining appropriate policies and standards.

Legal and Customer Requirement: Suppliers will perform all contracted services in a reasonably safe and professional manner and will identify and comply with applicable laws, regulations, standards and relevant customer requirements, as such laws, regulations, standards or requirements are amended from time to time.

Risk Management: Suppliers must have mechanisms to determine and manage risks in all areas addressed by this document.

Documentation: Suppliers must maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

Training and Competency: Suppliers will have training programs that achieve appropriate levels of knowledge, skills, and abilities in management and workers to address these expectations.

Continual Improvement: Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.

These policies were adopted on January 10th 2013. Ceisa Packaging reserves the right to modify these policies from time to time and suppliers will be expected to comply with these policies as revised.



Arthur Lepage
President Ceisa Packaging