

## 4.4 THE VIGILANCE PLAN

### Context of the law

**Law no. 2017-399 of March 27, 2017 on the Duty of Vigilance of parent companies and ordering companies** introduced an obligation for parent companies of groups employing more than 5,000 people in France or 10,000 people in France and abroad, to develop, publish and implement appropriate measures to identify the risks and the means to prevent violations of human rights and fundamental freedoms, and risks to the health and safety of people and the environment, which may result from the activities of the Group and its subsidiaries, and those of suppliers or subcontractors with which it has an established commercial relationship.

The purpose of this regulation is to:

- prevent serious incidents or breaches in the above areas throughout the Company's value chain;
- provide for the request of any person, justifying an interest to act, and to engage the responsibility of the author of any damage to repair it.

This obligation is based on five measures:

- 1) risk mapping (identification, analysis, prioritization);
- 2) procedures for regularly assessing the situation of subsidiaries, suppliers or subcontractors;
- 3) appropriate actions to mitigate risks or prevent serious breaches;

- 4) a mechanism for alerting and collecting alerts relating to the existence or occurrence of risks;
- 5) a system to monitor the measures implemented and assess their effectiveness.

Plastic Omnium meets the requirements of the French Duty of vigilance law by drawing up a Vigilance Plan, the content of which is presented below. It sets out the various steps taken for each challenge:

- human rights and fundamental freedoms;
- the health and safety of people;
- the environment.

The report on the effective implementation of Plastic Omnium's Vigilance Plan for 2022 is included in this paragraph 4.4 *Vigilance Plan* of this URD. It gives operational applications and refers to the monitoring indicators identified. The report on these measures concerns subsidiaries and suppliers.

The Vigilance Plan is an integral part of the Group's strategy, which includes a Sustainability pillar reflected in the ACT FOR ALL™ program. This program promotes sustainable business, responsible entrepreneurship and purchasing, and a strong focus on people.

### GOVERNANCE OF THE VIGILANCE PLAN

Governance bodies	Missions
<b>Board of Directors</b>	In 2022, the Board of Directors set up an Appointments and CSR Committee composed of three members. This Committee is informed of the content of the Vigilance Plan and reviews it every year.
<b>Executive Committee</b>	As part of a continuous improvement approach, the Vigilance Plan is monitored by the Executive Committees.
<b>The Group Internal Control and Compliance Committee</b>	Composed of the Chief Compliance Officer, the Group Chief Financial Officer, the Group HR Director, the Chairmen and Chief Financial Officers of the divisions, the Corporate Legal Director, the Operations Compliance Director, the Internal Audit and Risk Management Director, and the Internal Control Director, this committee's duties include the review of: the Group risk matrix, the missions of the internal control teams, the internal audit missions, schedules, audit points, supplier compliance, anti-corruption compliance and ethics issues reported via the whistleblowing process.
<b>Departments involved</b>	The Purchasing, Sustainability, Legal and Human Resources Departments participate in the drafting, implementation and monitoring of this Vigilance Plan.
<b>In the activities</b>	The Compliance Officers, internal controllers, legal experts and purchasing managers are in charge of deploying the Vigilance Plan in the activities.



## 1. RISK MAPPING

### For subsidiaries

The risks analyzed as part of the Vigilance Plan are listed in:

- **the Group risk mapping**, which presents the main risks considered as material and specific to Plastic Omnium's business and business lines;
- **the non-financial challenge materiality matrix**, which ranks risks and opportunities based on the assessment of the various stakeholders.

These risk factor definition tools take into account different levels of assessment.

In order to conduct the **Group risk mapping**, Plastic Omnium has reviewed and evaluated the risks that could have an adverse effect on its business, financial position, results or reputation. These risks have been assessed based on the probability of occurrence and their impact (after taking into account the measures adopted by the Group to manage these risks).

This risk matrix is drawn up at two levels:

- **at local level**: these analyses make it possible to score the risks and identify the actions implemented locally to prevent and correct potential breaches. The risks identified relate to all environmental issues (consumption of raw materials, discharges and pollution, chemical products, waste and attention to biodiversity, etc.) and health and safety issues (accidents, occupational illnesses and psycho-social

risks, etc.). ISO 14001, ISO 50001 and ISO 45001 certifications require the completion of a risk map for each certified site;

- **at Group level**: the annual review of the risk mapping makes it possible to identify all the risks borne by the Group. It involves the Group's operational departments, central functional departments and Internal Audit. Risks related to suppliers and subcontractors are incorporated into this analysis. The Group's risk mapping is presented in section 2 of the URD "Main risk factors" on p. 54.

Moreover, **the non-financial challenge materiality matrix** presents non-financial risks and opportunities based on the importance of these challenges for internal and external stakeholders and their impacts on Plastic Omnium's overall performance. Initially, a sector-based documentary analysis, a peer-based benchmark and a consultation of internal support materials enabled pre-selection of the 20 most important non-financial challenges for Plastic Omnium. The challenges were then prioritized by interviewing Plastic Omnium employees spread across all business lines and internationally and by conducting qualitative surveys with a panel of external stakeholders: customers, suppliers, associations, research centers, banks, partners and certification bodies. The Group's non-financial challenge materiality matrix is presented in section 4 of the URD "Statement of Non-Financial Performance" on p. 158.

The table below summarizes the risks identified in relation to the challenges of the Duty of Vigilance. It also specifies, using cross-references, the descriptions and mitigation measures put in place by the Group and described in this URD.

DUTY OF VIGILANCE STAKES

DUTY OF VIGILANCE STAKES



HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS



HEALTH AND SAFETY OF PEOPLE



ENVIRONMENT

ASSOCIATED RISKS

<ul style="list-style-type: none"> <li>• Human Rights risk</li> </ul>	Chapter 4.3.2.5 – NFRD	<ul style="list-style-type: none"> <li>• Risk to the health and safety of people</li> </ul>	Chapter 4.3.3.4 – NFRD + Chapter 2	<ul style="list-style-type: none"> <li>• Impact of climate change risk</li> </ul>	Chapter 4.3.3.1 – NFRD + Chapter 2
<ul style="list-style-type: none"> <li>• Human Resources risks</li> </ul>	Chapter 4.3.1.2 – NFRD	<ul style="list-style-type: none"> <li>• Human Resources risks</li> </ul>	Chapter 4.3.1.2 – NFRD	<ul style="list-style-type: none"> <li>• Natural/climate disaster risk</li> </ul>	Chapter 4.3.3.2 – NFRD
<ul style="list-style-type: none"> <li>• Responsible purchasing/supplier risk</li> </ul>	Chapter 4.3.2.4 – NFRD			<ul style="list-style-type: none"> <li>• Biodiversity risk</li> </ul>	Chapter 4.3.3.4 – NFRD
<ul style="list-style-type: none"> <li>• Cyber risk/IS continuity of service – data protection</li> </ul>	Chapter 4.3.2.2 – NFRD			<ul style="list-style-type: none"> <li>• Eco-design and recyclability risk</li> </ul>	Chapter 4.3.3.3 – NFRD

OPERATIONAL THEMES

RESPECT HUMAN RIGHTS IN THE VALUE PRODUCTION CHAIN

- Signatory of United Nations Global Compact
- ILO Convention
- ACT FOR ALL™ program
- Human Resources risk management: talent management, employee engagement, equal opportunities, social dialog
- Actions taken towards communities
- Supplier assessment programs
- Information technology security policy
- "Know Your Suppliers" approach
- Responsible Purchasing Charter

PROTECTING THE HEALTH AND SAFETY OF EMPLOYEES AND SUBCONTRACTORS

- Health and Safety policy
- ISO 45001 certification
- Safety training
- Health campaigns
- Workstation ergonomics procedures

REDUCING THE ENVIRONMENTAL IMPACT OF THE GROUP'S ACTIVITIES

- Carbon neutrality roadmap
- Biodiversity diagnostic
- ISO 50001 certification
- Materials R&D
- Life cycle analyses (LCA)
- Recycled materials innovations



### For suppliers

Plastic Omnium is developing a responsible approach to its purchases and supplies. This approach makes it possible, among other things, to identify the suppliers most at risk by integrating, for example, all suppliers in certain sectors targeted by the risk mapping: for example, intermediaries and service providers acting on behalf of Plastic Omnium, as well as customs brokers, are considered particularly exposed.

Supplier risk analysis is based on the following five risk factors: country, sector of activity, inclusion on international sanctions lists, the existence of politically exposed persons in governing bodies or the shareholding structure and published controversies.

In 2022, a supplier risk assessment platform was set up. Suppliers are assessed and categorized according to their risk profile: low (green), medium (orange) or high (red). This assessment takes into account their country of operation, their business sectors, and any sanctions and controversies to which they may have been subject. It also takes into account the profile of the main members of their governance bodies (Executive Committee, Board of Directors or shareholding structure).

Suppliers presenting a low risk (green) are not subject to any due diligence but are regularly monitored.

Suppliers presenting an average risk (orange) are required to actively engage in an assessment process in order to improve their performance. In the absence of supplier-specific initiatives, they are asked to complete the EcoVadis questionnaire. EcoVadis is a recognized global supplier of CSR assessments. This questionnaire assesses the performance of

companies in the areas of environment, human rights and ethics on the basis of documented arguments.

Lastly, suppliers presenting a high risk (red) must be the subject of an immediate action plan and remediation; failing this, they cannot be consulted for calls for tenders.

New suppliers are referenced on the basis of certain criteria, requiring different degrees of investigation, in the areas of quality, financial robustness and Sustainability performance.

## 2. ASSESSMENT MEASURES


### For subsidiaries

Several systems are in place to assess the performance of subsidiaries on the various themes taken into account in the Vigilance Plan (human rights and fundamental freedoms, health and safety of people, and the environment).

The indicators are collected via the Group's non-financial reporting tool. It is regularly monitored by the reporting managers in the subsidiaries and centrally. They are also published annually in the URD and audited by the independent auditors (see Report in Section 4.9).

The indicators of the ACT FOR ALL™ program (see table below) are monitored by a dedicated Management Committee. These results are used to set the main guidelines and targets, to define policies and to analyze deployment and any gaps. The main results are also presented to the European Works Council <sup>(1)</sup>.

1) The **European Works Council** is the institution representing personnel that brings together the various works councils of companies or facilities of transnational companies with subsidiaries and branches in different countries in the European Union.

	Markers	KPI	2022 result	2025 target
PILLAR 1 RESPONSIBLE ENTREPRENEURSHIP	Business ethics	Number of employees trained / targeted	88%	>98%
	Responsible purchasing	Based on an "IndueD" assessment for 95% of the purchasing base (in €), number of medium- and high-risk suppliers enrolled in a self-assessment initiative	714	To be defined
PILLAR 2 CARE FOR PEOPLE	Safety	Accidents with and without lost time - FR2	0.78 <sup>(1)</sup>	<0.5
	Ergonomics	Percentage of positions with severe ergonomic constraints	- 37% vs 2021	-50% vs. 2021
	Health	Percentage of sites supporting health initiatives	90 %	100%
	Diversity and Inclusion	Percentage of women: - Engineers & managers - Senior Executives	23.2%	25%
			23.2%	30%
	Promotion of youth employment	Number of interns, apprentices, and VIE	1,204	1,300 <sup>(2)</sup>
Local sponsorship initiatives	Proportion of sites that have undertaken actions to support local communities	86%	100%	
PILLAR 3 SUSTAINABLE BUSINESS	Top Planet Program	Top Planet score	59%	80%
	Reduction in the Scopes 1 & 2 carbon footprint	Scopes 1 & 2 CO <sub>2</sub> emissions <sup>(3)</sup>	-26% vs. 2019 -9% vs 2021	-80% vs. 2019
	Reduction in the Scope 3 carbon footprint	Scope 3 CO <sub>2</sub> emissions <sup>(3)</sup>	-29% vs. 2019 -5% vs 2021	-30% in 2030 vs. 2019
	Development of sustainable mobility initiatives at each site	Number of sites with sustainable mobility initiatives	40%	100%

(1) FR2 Group scope including minority JVs (excluding PO Lighting).

FR2 IFRS scope (excluding PO Lighting) = 0.97.

FR2 IFRS scope (with PO Lighting) = 1.16.

(2) 2025 target revised upwards as previous target (1,000) exceeded

(3) Excluding acquisitions made in 2022

In addition, the Internal Audit Department plans an annual program of control visits to subsidiaries and sites. In early 2022, the audits continued remotely or in person with the help of a local auditor. 25 audits were carried out in this way in 2022. During these audits, quality, health / safety, environment and human rights aspects are regularly addressed.

**For suppliers**

To assess and support its suppliers in the development of their Sustainability approach, Plastic Omnium has implemented the Know Your Suppliers approach.

**Suppliers' Charter**

When referenced, Plastic Omnium requires each supplier to sign the Group's Suppliers' Charter, available on the Internet. Equivalence with their own charters, if comparable, is accepted. The Suppliers' Charter addresses human rights in the following sections: Section 3 "Human rights and working conditions" and Section 4 "Protection of health and safety".

Deployed since 2016, the charter is built around the following references:

- the United Nations' Universal Declaration of Human Rights and its two additional covenants (the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights);
- the ten principles of the United Nations Global Compact;
- the Fundamental Conventions of the ILO (International Labour Organization) and the ILO Declaration on fundamental labor principles and rights;
- the OECD Guidelines.

The suppliers undertake to comply with:

- competition law;
- laws and regulations aiming to fight corruption and money laundering;
- Human Rights and working conditions: prohibition of the use of forced or compulsory labor in all its forms, the use of child labor, prohibition of discrimination in terms of employment and working conditions and guarantee of equal pay and freedom of association and protection of the right to organize. Finally, they are committed to maintaining a safe and healthy work environment.

In the event of a breach, Plastic Omnium may require the supplier to take corrective measures or terminate all or part of the contract for negligent non-performance.

**Supplier assessment**

The Know Your Suppliers approach includes the general assessment of a panel of suppliers covering 95% of its expenditure, through a risk assessment platform.

More in-depth assessments according to criteria defined each year are carried out in partnership with EcoVadis.

All information related to suppliers is accessible via a digital platform and can be consulted by all the Group's buyers.

**The Supplier Compliance Committee**

The Supplier Compliance Committee, made up of the Responsible Purchasing, Sustainability, Legal and Internal Control Departments, ensures the relevance of the procedures and processes in force, validates the assessment criteria, and defines the roadmap for supplier Sustainability. Lastly, it endorses remediation solutions for suppliers presenting high risks.

**3. PREVENTION AND MITIGATION ACTIONS**

**For subsidiaries**

The risks included in the Vigilance Plan and the associated mitigation measures are described in the Statement of Non-Financial Performance.

The table below presents the risks defined as part of the vigilance plan, the associated mitigation procedures and the monitoring indicators put in place.

**1) Human rights and fundamental freedoms**

**Human Rights risk**

Risk of violation of fundamental human rights in the workplace or in the value chain



- Signatory of United Nations Global Compact
- Fundamental Conventions of the International Labour Organization (ILO)
- ILO Declaration on Fundamental Principles and Rights at Work, OECD Guidelines
- Vigilance Plan
- ACT FOR ALL™ program
- Conflict minerals policy
- Initiatives in favor of local communities
- Health campaigns
- Human Rights policy
- % of sites that proposed an action in favor of local communities: 86%
- % of sites that offered at least one health campaign: 90%

8 DECENT WORK AND ECONOMIC GROWTH












10 REDUCED INEQUALITIES



16 PEACE, JUSTICE AND STRONG INSTITUTIONS



<p><b>Human Resources risks</b></p> <ul style="list-style-type: none"> <li>• <b>talent and skills management</b> risk of generating frustration among employees or dampening the Company's dynamism and performance</li> <li>• <b>employee engagement</b> risk of reducing employee involvement</li> <li>• <b>equal opportunities</b> risk of discrimination</li> <li>• <b>social dialog</b> risk of impacting the Company's productivity or development</li> </ul> 	<ul style="list-style-type: none"> <li>• Human Resources policy</li> <li>• Talent identification process</li> <li>• OMEGA transformation project</li> <li>• Compensation policy</li> <li>• VIE contracts and partnerships with schools</li> <li>• Diversity policy</li> <li>• Mission for workers with disabilities in France</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of women in the workforce: 31%</li> <li>• Proportion of engineers and managers that are women: 23.2%</li> <li>• Number of interns, apprentices and VIE: 1,204</li> <li>• Number of workers with disabilities: 389</li> </ul>	<p>3 GOOD HEALTH AND WELL-BEING 166</p>  <p>5 GENDER EQUALITY</p>  <p>8 DECENT WORK AND ECONOMIC GROWTH</p>  <p>10 REDUCED INEQUALITIES</p> 
<p><b>Responsible purchasing/supplier risks</b></p> <p>Risk of impacting the Group's operational activities, performance or reputation through a failure in any part of the supply chain</p> 	<ul style="list-style-type: none"> <li>• "Know Your Suppliers" approach</li> <li>• ACT FOR ALL™ program</li> <li>• Carbon neutrality roadmap</li> <li>• Vigilance plan</li> <li>• Supplier mapping</li> <li>• EcoVadis assessment</li> <li>• Supplier visits and audits</li> <li>• Responsible Purchasing Charter</li> <li>• Integration of CSR and business ethics clauses in supplier contracts</li> <li>• Whistleblowing procedure</li> <li>• Conflict minerals policy</li> </ul>	<ul style="list-style-type: none"> <li>• % of Group purchases assessed as part of the <i>Know Your Suppliers</i> approach: 95%</li> </ul>	<p>8 DECENT WORK AND ECONOMIC GROWTH 180</p> 
<p><b>Cyber risk – IT continuity of service – data protection</b></p> <p>Risk of financial loss, business interruption or damage to a Company's reputation due to IT system failures</p> 	<ul style="list-style-type: none"> <li>• Information Technology Security Policy</li> <li>• Cybersecurity and GDPR training</li> </ul>	<ul style="list-style-type: none"> <li>• External audits: 9 sites certified or recertified with the TISAX standard (Trusted Information Security Assessment Exchange) in 2022</li> </ul>	<p>8 DECENT WORK AND ECONOMIC GROWTH 177</p> 

**2) Personal Health and Safety**

**Personal Health and Safety Risks**

Likelihood of employees and subcontractors being exposed to a dangerous situation (damage to their physical and/or mental health).



- Health and safety policy
- Top Safety training
- ISO 45001 Health and Safety Management System
- Covid-19 protocol
- Workstation ergonomics procedures (assessment, anticipation, training, etc.)

FR2: 1.16 <sup>(1)</sup>  
Number of people trained in Top Safety and Stop 5: 785  
Percentage of workstations assessed for ergonomics: 99%



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**Human Resources risks**

- **talent and skills management** risk of generating frustration among employees or dampening the Company's dynamism and performance
- **employee engagement** risk of reducing employee involvement
- **equal opportunities** risk of discrimination
- **social dialog** risk of impacting the Company's productivity or development



- Human Resources policy
- Talent identification process
- OMEGA transformation project
- Compensation policy
- VIE contracts and partnerships with schools
- Diversity policy
- Mission for workers with disabilities in France

- Percentage of women in the workforce: 31%
- Proportion of engineers and managers that are women: 23.2%
- Number of interns, apprentices and VIE: 1,204
- Number of workers with disabilities: 389



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1) IFRS scope - FR2 Group scope including minority joint ventures = 0.95.



3) Environment

**Risk related to the impact of climate change on the Company's business model (no mitigation of climate change)**

Risk of not implementing all actions to mitigate the impact of the Group's activities and fight against global warming



- "Carbon neutrality" targets and roadmap aligned with the Paris Agreement and approved by the SBTi in 2021
- Sites' energy decarbonization policy (decarbonized energy, facilities to produce renewable energy, and PPA)
- ISO 50001 certification
- Scope 3 reduction policy by working on the value chain
- R&D on materials, bio-sourcing and research into replacing materials with low-impact products
- Life cycle analyses for Plastic Omnium's projects and products and those of suppliers
- Innovative partnerships
- Development of hydrogen energy for clean mobility
- CO<sub>2</sub> emissions
  - scope 1: 77 kt CO<sub>2</sub>-eq
  - scope 2: 304 kt CO<sub>2</sub>-eq
  - scope 3: 29,915 kt CO<sub>2</sub>-eq
- Top Planet Score: 59%
- Number of industrial sites equipped to generate renewable energy: 13



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**Natural/climate disasters risk (non-adaptation to climate change)**

Risk of being impacted by the consequences of climate change: increased costs (price of materials, insurance, etc.) and impacts on production (production stoppages, supply of materials, etc.)



- Audits carried out by insurers
- Number of site visits by insurers: 86



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**Biodiversity risk**

Risk that the industrial or economic activities of the company impact other living species



- Implementation of a biodiversity approach in 2022
- Indicator in the process of being defined



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**Eco-design and recyclability risk**

Risk of reducing the planetary capacity to respond to the growing challenges of mobility

Risk of not reducing the Group's environmental footprint



- Life cycle analyses (LCA)
- Development of R&D projects on alternatives to high-impact materials (plastics, carbon fiber, etc.)
- Development of innovative solutions and partnerships to improve the effective recyclability of products
- Development of solutions to integrate more recycled materials into products
- 86% of waste is recycled or recovered



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### FOCUS ON THE CODE OF CONDUCT

A number of policies and procedures govern the actions of the Group and its subsidiaries. The Code of Ethics is the first instrument governing the actions of the Company and its employees. It presents the non-negotiable rules that the Group has set itself in terms of respect for Human Rights, fundamental freedoms, health and safety, diversity, the environment and preventing discrimination, fraud, corruption and influence peddling. It also reminds employees of their obligations: protecting the Group's assets and image, guaranteeing product quality and safety, and complying with ethics rules and regulations. The Code of Conduct is translated into the main languages used within the Group, i.e. 22 languages to date.

In addition, Plastic Omnium's membership of the United Nations Global Compact since 2003 requires it to comply with the 10 principles relating to respect for Human Rights and international standards on labor, environmental protection and the fight against corruption.

The Internal Control and Compliance Committee is composed of managers from Human Resources, Finance, Compliance, Risks and Internal Audit, and Business Lines Departments. It guides the Group's compliance policies and actions and relies on a network of Compliance correspondents around the world.

Mechanisms to comply with the French law known as the Sapin 2 law (law no. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life) were put in place and implemented by the Group as follows:

- employee training and awareness;
- the e-learning Code of Conduct was followed in English by all new Group managers. It is included in the Welcome package for managers. It is available in seven languages and will be translated into the languages of three new countries (India, Japan, Brazil) in 2023. Whenever a new translation is available, all managers in the country concerned repeat this e-learning course in their language;
- the anti-corruption e-learning, available in 22 languages, is followed by all Group managers and non-managers in the exposed functions (purchasing, sales, logistics, finance). In June 2022, a training campaign for this module began, which ended in December.

#### For suppliers

Since 2021, the assessment of a supplier has had certain consequences: a supplier whose risk is high will first of all be accompanied, in order to understand the reasons for its assessment and the possibility of rapid remediation. If its risk profile is confirmed, it will have to put in place an action plan that will be validated and monitored by Plastic Omnium. In the absence of an action and improvement plan, it may be excluded from the panel.

Additional measures are also in place:

- the conditional requirement to certain contractors to be certified according to the ISO 14001, ISO 45001 standards;
- a major discrepancy identified, for example during an audit, that may lead the Group to take all necessary measures to guarantee its integrity and sustainability;
- training;
- the inclusion of contractual clauses on social and environmental issues in the General Supply Terms and Conditions in its supplier, subcontractor and service provider contracts.

Two issues in particular are monitored by the Group:

- chemical products: products covered by the European REACH regulation must be registered. Plastic Omnium is working with an external service provider to ensure that products meet regulations and that the safety data sheets (which provide information on risks and stipulate usage precautions) are up to date. Because the lists of products covered by REACH change regularly, this work involves anticipating regulations;
  - conflict minerals (see page 181).

## 4. WHISTLEBLOWING PROCEDURE

### Whistleblowing system

Since 2018, the whistleblowing system has been accessible to external third parties via the Code of Conduct section of the Group's website. This system manages alerts in the strictest confidentiality, so that whistleblowers can report any potential breaches without fear of retaliation, in accordance with local laws.

The process is described in the Code of Conduct, available in 22 languages on the intranet and on the Group's website. The procedures for system entry were also presented to the competent Employee Representative Bodies.

### Alert processing

Employees can alert their managers or any other person if they wish or use the two channels available to them:

- an email address: [corporatesecretary.ethicsalert@plasticomnium.com](mailto:corporatesecretary.ethicsalert@plasticomnium.com);
- a mailing address: Compagnie Plastic Omnium, Alerte Éthique, 1, allée Pierre-Burelle, 92300 Levallois-Perret, France.

The information is processed anonymously and sent to the Group Compliance Department.

In 2022, eight alerts were received.

A dedicated committee is in charge of monitoring and processing these alerts (excluding the activity of HBPO, whose alerts are monitored by the Compliance Officers, but following the acquisition of HBPO, the process will be modified in 2023 so that the activity of HBPO is included). This *ad hoc* Committee is composed of the Compliance, Human Resources and Internal Audit Departments. It studies the alerts, the need to call on an internal or external third party to investigate, decides on the response to the alert, monitors progress and/or closes the alert.

## 5. MONITORING OF MEASURES IMPLEMENTED AND ASSESSMENT OF THEIR EFFECTIVENESS

Non-financial data is presented annually in this section and is monitored on a monthly, quarterly or annual basis using dedicated reporting tools to measure changes, improvements and any discrepancies to be corrected. These data concern, for example, work organization, overtime, compensation, incidents of discrimination, equal opportunities, health and safety as well as greenhouse gas emissions and energy consumption, consumption of raw materials, waste and environmental incidents.

The challenges addressed by the ACT FOR ALL™ program are subject to specific monitoring within dedicated Committees. In addition, targets have been set for the ACT FOR ALL™ program's principal markers by 2025 with intermediate annual targets (See the ACT FOR ALL™ table on page 154).

The assessments carried out by third parties show a constant improvement in the Group's non-financial performance (refer to the section entitled "Report from the Independent Third-Party" on page 237).