

ALCAN PACKAGING SOCIAL RESPONSIBILITY DIRECTIVE ANSWERS TO FREQUENTLY ASKED QUESTIONS

1. Why is Alcan Packaging launching this Directive?

Based on our Code of Conduct, Alcan and Alcan Packaging have essential values and principles that guide us as we adapt and grow in our markets. Our commitment to using the highest standards of human rights in all of our facilities around the world is non-negotiable. Located in more than 30 countries, with different cultures and social environments, Alcan Packaging considers that it is its duty to formalize its commitments in a simple and clear document that all our stakeholders can refer to.

2. What does the Alcan Packaging Social Responsibility Directive (the “Directive”) cover?

The directive covers three main topics. The first is related to compliance with applicable laws, regulations and standards. The second includes human rights in the workplace, for example: prohibition of child labor, harassment or discrimination, promotion of freedom of association and open communications, definition of disciplinary practices and security arrangements. The third topic covers our environment, safety and health rules.

The directive is fact-based in order to facilitate its implementation internally by our plants and externally by our suppliers and contractors.

3. When will the Alcan Packaging Social Responsibility Directive be implemented?

All of our plant managers, procurement organization and sales force have received the Directive and its implementation is currently taking place.

All items included in the Social Responsibility Directive are compulsory and must be implemented by all of our sites as well as our suppliers and contractors.

4. How will you guarantee that the Alcan Packaging Social Responsibility Directive is fully and properly implemented?

Each of our plants has received full explanation of and training in implementation of the Alcan Packaging Social Responsibility Directive. We also sent the Directive to our suppliers and contractors. Their current Alcan Packaging contacts can answer any specific question they may have. As the Alcan Packaging Social Responsibility Directive is compulsory and must be fully implemented, we will be very cautious and conduct audits when necessary.

As a Supplier or a Contractor:**5. Do we have to comply with the Alcan Packaging Social Responsibility Directive?**

Yes. Compliance with the Directive is a prerequisite to doing business with us. It is non-negotiable. If you have difficulties understanding or implementing the Directive, please contact us ASAP.

6. Do our suppliers and sub-contractors have to comply with the Alcan Packaging Social Responsibility Directive?

We recommend that you strive for the same high standards when doing business with your own suppliers and sub-contractors as when working with Alcan Packaging.

7. Will you give us time to fully comply with the Directive?

Please bear in mind that the Alcan Packaging Social Responsibility Directive is a key criteria when we select our suppliers and contractors. In a limited number of cases, our requirements might allow extra time for the Directive to be fully implemented. In such cases, you should proactively contact us to propose a corrective action plan, including precise deadlines to implement adequate procedures and measures. We will jointly review and agree on a firm but realistic operating agenda.

8. Are you going to audit all suppliers and contractors?

All suppliers and sub-contractors have to adhere to the Alcan Packaging Social Responsibility Directive's requirements, but that does not mean that all suppliers and sub-contractors will be audited.

For each product/process, a grid of social responsibility risk exposure has been established. Our audits will be conducted according to this grid and your Alcan Packaging contact will give you more details, if needed. These audits are essential tools to verify compliance with our requirements, to better collaborate with our suppliers and contractors and to further assess our overall risks and diminish them accordingly.

9. Have you already started Directive audits?

Yes. We began the audit process when we launched the Directive.

10. Will we be informed in advance when an audit will be launched?

Yes. Should an audit be launched at your company, your Alcan Packaging contact will inform you in advance.

11. If we have already been audited by one customer, do we have to restart the whole process or will you refer to the former audit?

If you can share the report with us, we will review the findings and compare them to our requirements. This will perhaps lead to a less strenuous audit process. If we can't have access to the audit results, we will proceed with our own audit.



12. Are you conducting the Social Responsibility audits yourself?

We want the process to be objective and transparent. We have chosen an external auditor—a leading global provider of Social Responsibility audits.

13. Will Alcan Packaging audit its own production sites?

The requirements described in the Alcan Packaging Social Responsibility Directive are binding to our suppliers and sub-contractors as well as to our own sites. They are non-negotiable. Therefore Alcan Packaging will audit all of its production sites worldwide through the selected external auditing firm. Our internal audit process has already started.

14. If there are specific statutory requirements that conflict with the Directive, do we still have to comply?

In the event that statutory requirements conflict with Alcan Packaging Social Responsibility Directive, you would have to comply with statutory requirements.

15. What happens if we do not pass the Directive audit?

If you fail to comply with the Alcan Packaging Social Responsibility Directive, we will ask you to remedy the situation in a given timeframe, according to the severity of the non-compliances.

Based on a corrective action plan that we will agree on, a follow-up audit will be carried out to confirm that you have developed and implemented appropriate procedures and measures to ensure compliance with Alcan Packaging Social Responsibility Directive requirements.

Would you continue to fail the audit, we would have no choice but terminate our business relationship.

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