

ALCAN PACKAGING SOCIAL RESPONSIBILITY DIRECTIVE

Alcan has set an historical benchmark in ethical practices by first releasing a policy framework back in 1978. It was since updated as the *Worldwide Code of Employee and Business Conduct* (the “Code of Conduct”).

The Code of Conduct stipulates that Alcan is committed to conducting its business in an ethical, legal, social and environmentally responsible manner.

Alcan has also joined the Business Leader Initiative on Human Rights as a further demonstration of its commitment to employing the highest standard of human rights in all of its worldwide locations and, through local stakeholders, to promoting these rights throughout the communities in which it operates.

Pursuant to the Code of Conduct, and in accordance with Alcan’s *EHS FIRST* directive, Alcan Packaging has developed this Social Responsibility Directive (the “Directive”), which applies to all Alcan Packaging facilities worldwide.

This Directive states Alcan Packaging’s minimum expectations.

Alcan Packaging facilities shall require that their suppliers and/or contractors accept and implement the Directive’s requirements in their own operations.

Alcan Packaging facilities shall inform management promptly of any significant adverse event in accordance with this Directive.



A. Compliance with Applicable Laws, Regulations and Standards

All business activities in which Alcan Packaging facilities are engaged shall comply with the Directive.

In the event that statutory requirements conflict with the Directive, Alcan Packaging facilities shall comply with statutory requirements.

B. Human Rights and the Workplace

The Code of Conduct in relation to Human Rights and the Workplace states:

“Alcan supports and respects internationally proclaimed human rights consistent with the Universal Declaration of Human Rights and will take active steps to ensure it is not complicit in human rights abuses. Our human rights obligations extend to all people, regardless of race, gender, national origin, and religious and political beliefs.

In our interactions with employees, including those of our business partners, we observe the core labour standards of the International Labour Organization. Respect is central to a harmonious workplace, where the rights of employees are upheld, and where their dignity is affirmed, free of intimidation, discrimination or coercion of any kind.”

B.1. Child Labour

Alcan Packaging facilities will not engage in practices inconsistent with the provisions of any International Labour Organization (“ILO”) convention regarding the rights of children.

In particular, the minimum age for employment or work shall not be less than the age of completion of compulsory schooling, which in any event shall not be less than 15 years of age.

Any work performed by children enrolled in schooling for general, vocational or technical education, or in other similar training institutions shall be part of a formalised training programme.

In addition, the minimum age required to perform any type of employment or work, which by its nature or the circumstances may jeopardise the health or safety of young persons shall not be less than 18 years of age. Therefore, workers under the age of 18 years shall not be employed during nightshifts.

B.2. Involuntary and Forced Labour

Alcan Packaging facilities shall not use forced, bonded or indentured labour or involuntary prison labour.

B.3. Freedom of Association and Collective Bargaining

Alcan Packaging facilities shall recognise and respect the rights of employees to freely associate, organise and bargain collectively in accordance with the laws of the countries in which they are employed.

In particular, Alcan Packaging facilities recognise the importance of open communication between employees and management. Employees can communicate openly with management without fear of harassment, intimidation, penalty, interference or reprisal.

B.4. Non-Discrimination

Alcan Packaging recognises and respects cultural differences. We believe that employees should be employed on the basis of their ability to perform the job, rather than on the basis of any other personal characteristics or beliefs.

Alcan Packaging facilities shall not discriminate in hiring and employment practices on the basis of race, gender, national origin, religious belief or any other personal characteristic or belief protected by law.

B.5. Working Hours

Alcan Packaging facilities are committed to ensuring that non-supervisory employees do not exceed a 60-hour workweek, including overtime, except in exceptional business circumstances which is for a limited period of time.

Employees are normally to be provided with one day off from work in every seven. The one day off from work shall not be paid, or otherwise compensated, in lieu of the time off or deferred until a later date.

B.6. Compensation & Benefits

Alcan Packaging facilities shall comply, at a minimum, with all wage and working hour laws and regulations. This includes those pertaining to minimum wages and overtime wages.

Elements of compensation shall include periodic holidays with pay, in accordance with local rules.



B.7. Disciplinary Practices and Harassment

Alcan Packaging facilities shall strive to provide a work environment free of harassment.

Disciplinary deductions from wages and/or salaries not authorized under national laws shall not be made.

B.8. Security Arrangements

Alcan Packaging facilities shall employ security arrangements that respect internationally recognized human rights, local laws and professional standards.

C. Environment, Health and Safety

Alcan Packaging facilities are committed to Alcan's *EHS FIRST* directive which provides company-wide standards, procedures and best practices aimed at attaining world-class EHS performance.

C.1 Health and Safety

Alcan Packaging facilities shall integrate and maintain appropriate health and safety management practices into all aspects of their business activities.

C.1.1. Management Systems

Alcan Packaging facilities shall be certified in accordance with OHSAS 18001 or equivalent standards.

C.1.2. Workplace Environment

Clean drinking water, clean restrooms, adequate ventilation and lighting shall be provided to employees.

C.1.3. Accident, Health Issues Prevention

Alcan Packaging facilities shall have appropriate work procedures and permits (such as working at heights permits, fire permits, lock out/tag out system, operating licences, etc.), protective measures (such as physical guards, interlocks, handling systems, fire prevention systems, etc.) as well as verification procedures (such as inspections of safety devices, audits of safety practices, etc.) to minimize safety risks in the workplace.

Alcan Packaging facilities shall take steps to control employee exposure to hazardous chemicals, biological, and physical agents including noise and heat, as well as to physically demanding work.

In addition, Alcan Packaging facilities shall provide employees with appropriate personal protective equipment and tools.

Employees shall receive appropriate workplace health and safety information, warnings and training (such as chemical risks, safe handling methods, etc.) in their first language.

C.1.4. Emergency Preparedness and Response

Alcan Packaging facilities shall identify, and assess potential emergency situations and implement and maintain appropriate response measures.

C.1.5 Occupational Injury and Illness Management

Alcan Packaging facilities shall establish procedures and systems to record, investigate and report on apparent occupational injury and illness cases, including the implementation of corrective action.

C.1.6 Dormitories

Employee dormitories, provided by Alcan Packaging facilities, shall be clean and safe, provide emergency egress, adequate heat and ventilation, as well as reasonable personal space.



C.2 Environment

Alcan Packaging facilities shall integrate appropriate environment management practices into all aspects of their business activities.

C.2.1 Management systems

Alcan Packaging facilities shall be certified in accordance with ISO 14001 or equivalent standards.

C.2.2 Emission to Air or Water and Waste Management

Emissions to air and water, as well as waste generation, must be identified, monitored and addressed to reduce their impact on the environment as far as reasonably practicable.

C.2.3. Emergency Preparedness and Response

Alcan Packaging facilities shall identify, and assess potential emergency situations and implement and maintain appropriate emergency response measures in order to minimise their impact, including emergency reporting and recovery plans.

C.2.4.Environmental Permits and Reporting

Alcan Packaging facilities shall obtain, maintain, and keep current all required environmental permits, licenses, and registrations.

C.2.5. Preservation of Natural Resources and Energy

Each Alcan Packaging facility shall have a program in place to reduce to the extent reasonably possible natural resources, water and energy use, by implementing appropriate conservation measures and by seeking to recycle, re-use, or substitute materials where possible.

D. Subcontracting and Suppliers

Alcan Packaging facilities shall review a supplier's and/or a contractor's status if requirements of the Alcan Packaging Social Responsibility Directive are not met or maintained.

**SUPPLIERS* COMMITMENT TO THE
ALCAN PACKAGING
SOCIAL RESPONSIBILITY DIRECTIVE**

Alcan's *Worldwide Code of Employee and Business Conduct* (the "Code of Conduct") stipulates that Alcan is committed to conducting its business in an ethical, legal, social and environmentally responsible manner.

Alcan has also joined the Business Leader Initiative on Human Rights as a further demonstration of its commitment to employing the highest standard of human rights in all of its locations throughout the world, and through local stakeholders to promoting these rights throughout the communities in which it operates.

Pursuant to Alcan's Code of Conduct, and in accordance with Alcan's *EHS FIRST* directive, Alcan Packaging has developed this Social Responsibility Directive (the "Directive").

For activities related to providing goods and/or services to Alcan Packaging, throughout the world Alcan Packaging expects all its suppliers to conform to the Directive's requirements.

With regard to management systems as per C.1.1 and C.2.1 suppliers will be expected to take active steps towards implementation and certification.

Failure to implement the Directive's requirements or the identification of significant gaps will be sufficient cause for Alcan Packaging to exercise its right to review the supplier's status.

Suppliers shall promptly inform Alcan Packaging of any significant adverse event (e.g. fires, accidental discharges, death of employees, etc.) or findings of violations of applicable laws or regulations.

With respect to the requirements contained in this Directive, suppliers shall allow Alcan Packaging representatives access to their facilities, at reasonable times and upon reasonable notice, to perform appropriate inspections and/or audits to ensure compliance with the Directive.

(* When used herein, the term "supplier" shall refer to suppliers, contractors and sub-contractors.)