



MAUSER Packaging Solutions Anti-Corruption Policy

This policy applies to all of the MAUSER Packaging Solutions, including all business units, Corporate, and Global Functions.

Policy Owner: General Counsel
Effective Date: October 8, 2018

MAUSER PACKAGING SOLUTIONS
ANTI-CORRUPTION POLICY
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Introduction and Purpose

As described in the Mauser Packaging Solutions (the “Company”) Code of Conduct and Business Ethics, the Company strictly prohibits bribery and expects all persons working on its behalf to refrain from corrupt conduct of any kind, anywhere in the world.

The purpose of these Anti-Corruption Guidelines (“Guidelines”) is to provide concrete guidance regarding the letter and spirit of applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act (“UKBA”), and the Brazilian Clean Companies Act (collectively, “Anti-Corruption Laws”).

These Guidelines apply to the Company’s personnel worldwide, including all directors, officers, and employees of the Company and its subsidiaries or offices. All personnel including directors, officers, and employees of the Company are referred to as “Employees”.

1. Definitions

1.1 Bribery

Bribery is one of the most pervasive forms of corruption. Bribes may include promising, giving, offering, or authorizing the provision of something of value to anyone to secure an improper advantage, such as obtaining a contract, government action, or commercial benefit; to induce anyone to improperly perform a function or duty; to reward anyone for the improper performance of a function or duty; or with the belief that the acceptance is improper.

1.2 Corruption

Corruption is the abuse of entrusted authority (power or position) for illicit gain or personal benefit, including all acts of bribery.

1.3 Facilitation Payments

Also called ‘facilitating’, ‘speed’ or ‘grease’ payments, a facilitating payment is usually a small, unofficial payment to a Government Official to expedite or secure the performance of non-discretionary, routine governmental duty, such as processing visa applications, permits, or licenses to which the payer is already entitled.

1.4 Government Officials

Under Anti-Corruption Laws, the term “Government Official” is broadly defined to include employees, officers, or persons acting in an official capacity for (i) a local or national government; (ii) a government department, agency, or instrumentality; (iii) a commercial business owned, controlled or operated by a government; or (iv) a public international organization, like the World Bank, United Nations, or International Monetary Fund. Political parties, the employees and officials, and candidates for political office also are considered to be Government Officials.

1.5 Anything of Value

Bribery and corruption can involve more than the transfer of money. As described in the Code of Conduct and Business Ethics, “anything of value” may include items that the recipient would find useful or beneficial, such as gift cards or other cash equivalents, gifts, favors, donations, loans, tickets, benefits for family members, (such as employment offers or internships), meals, money, entertainment, travel expenses, discounts on products or services, employment offers or internships, and business opportunities.

1.6 Third Parties

Third Parties include any outside party acting on behalf of the Company, such as agents, contractors and suppliers, consultants, customs brokers, distributors, lobbyists, resellers, joint venture partners, and other representatives.

2. Prohibitions

As set forth in the Code of Conduct and Business Ethics, the Company strictly prohibits corrupt conduct, including offering or accepting bribes, as well as any other transaction which could be perceived as corrupt.

Employees and persons acting on the Company's behalf may not, directly or indirectly (including through a Third Party) promise, give, offer, or consent, agree to, or authorize the provision of Anything of Value to any person to secure an improper advantage.

The following Guidelines are in place to help the Company personnel identify, prevent, stop, and report possible acts of corruption. Specifically, the Guidelines set forth procedures for dealing with (i) Gifts, Hospitality and Travel, (ii) Charitable Contributions, (iii), Political Contributions, (iv) Facilitating Payments, and (v) Books and Records.

3. Guidelines

3.1 Gifts, Hospitality and Travel

As described in detail in the Code of Conduct and Business Ethics, the offer and receipt of gifts, hospitality, travel, and entertainment-related expenses (collectively, "business courtesies") can present certain risks of corruption. Company personnel should exercise caution and good judgment to ensure that no gifts, hospitality, travel or entertainment-related expenses create the expectation or appearance of impropriety.

Employees must seek pre-approval from the Chief Compliance Officer or his/her designee before providing any gift, hospitality, travel or entertainment-related business courtesy to a commercial customer or business partner valued at U.S.\$200 or more. All business courtesies of any value involving Government Officials must be pre-approved by the Chief Compliance Officer or his/her designee. Approval requests must include a precise description of the courtesy, the purpose, the participants, and the value.

Proper documentation must be retained for all expenditures.

Gifts of a value greater than \$75 received by Company Employees must be reported to the Regional Compliance Officer and should not be retained for personal or private use.

3.2 Charitable Contributions and Sponsorships

Charitable donations cannot be used as a pretense for bribes, and must not be made in violation of applicable laws or the Company Code of Conduct and Business Ethics. Charitable donations may never be offered to improperly influence or induce any act or decision, or to secure any improper advantage. Charitable contributions may only be made to bona fide charitable organizations.

Employees must seek pre-approval from the Chief Compliance Officer or his/her designee before providing any charitable donation on behalf of the Company. Approval requests must include a precise description of the recipient organization, the requesting party or person, the purpose of the donation, and the value. Proper documentation must be retained for all charitable donations.

3.3 Political Contributions

Employees and Third Parties cannot commit to or make any contribution (directly or indirectly) on behalf of the Company to foreign or domestic political parties, party officials, candidates, or organizations or individuals engaged in politics.

3.4 Facilitating Payments

Facilitating Payments are permitted under the FCPA but may violate the UKBA and other local laws. Consequently, the Company generally prohibits facilitating payments except in extremely limited circumstances. For example, there may be situations in which a payment otherwise prohibited by the Company policy may be made in response to an imminent threat to a person's physical health or safety.

Employees who believe that a facilitating payment is necessary must contact the Chief Compliance Officer or his/her designee and obtain prior written approval prior to making a facilitating payment. If circumstances make pre-approval impossible, the facilitating payment must be reported promptly to the Chief Compliance Officer or his/her designee. All facilitating payments must be recorded properly in the Company's books and records.

3.5 Books and Records

All transactions involving the Company's funds or assets must be described and recorded accurately and in reasonable detail in our books and records. The use of fictitious, inaccurate, or misleading documentation to support transactions is strictly prohibited.

4. Questions

If an Employee has any questions that are not answered in these Guidelines, or questions about whether specific conduct is lawful or appropriate, he or she should consult the Chief Compliance Officer or his/her designee, or the Legal and Compliance Department.

5. Reporting

Employees are expected to report any known or suspected violations of law or the Company policies immediately. Employees may report such information to any of the following:

- Local supervisor or manager;
- Chief Compliance Officer or his/her designee;
- Regional Compliance Officer;
- Anonymous compliance hotline (www.mauserpackagingethicsline.com).

Any manager or supervisor who is notified of a known or suspected violation of this policy must report such matter immediately to the Chief Compliance Officer or his/her designee, or the Legal and Compliance Department. The Company will treat all reports seriously and will investigate them as appropriate.

6. Audits

The Legal and Compliance Department or Internal Audit will carry out periodic reviews and audits of the Guidelines to determine whether applicable laws, policies, and requirements are being observed. Employees are obliged to give full assistance in these audits.

7. Contact Details

Name	Title	Contact Details
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These Guidelines are effective immediately.

Oak Brook, Illinois October 8, 2018