

## **Diversity, Equity and Inclusion Policy**

Aptar is committed to creating a fair and equitable workplace where everyone can thrive. Underpinned by our Core Values and Leadership principles, we foster work environments, which encourage diverse and inclusive cultures among all our people.

Our Diversity, Equity and Inclusion Policy takes account of relevant legal standards. We aim to abide by and promote equality legislation by following both the letter and the spirit of the law in this area.

Our people are the most valuable assets we have. Believing in the self-worth of everyone is a pillar of our core values. We define diversity at Aptar as all the many ways we are unique such as gender, age, religious belief, sexual orientation, race, ethnicity, national origin, disability, pregnancy/maternity and other differences which can be celebrated and engaged to achieve excellence. This is critical for our business success but also engagement with our customers and suppliers.

The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant contribution to not only our culture, but to our reputation and corporate achievement as well.

Inclusion is a demonstrated intentional behavior that promotes and sustains a sense of belonging, making it possible for all individuals to thrive by creating a workplace that values who they are and what they offer to achieve company success.

Aptar's diversity initiatives are focused on increasing the gender balance of leadership at all levels. Through this effort, our practices and policies on recruitment and selection, compensation and benefits, professional development and training, promotions, assignments, separations, and community outreach are valued and implemented throughout the organization.

Aptar is committed to:

- ensuring that policies, strategies, processes and behaviors that promote equality and contribute to an inclusive organisational culture are in place;
- understanding, valuing and working constructively with diversity to enable fair and full participation in our work and activities;
- ensuring that there is no unjustified discrimination in our recruitment, selection, performance management and other processes;
- ensuring action that promotes equality; this includes conducting equality screening and impact assessments of policies and functions and progressing diversity action plans; treating individuals with whom we work with fairness, dignity and respect; and playing our part in removing barriers and redressing imbalances caused by inequality and unjustified discrimination.

Aptar supports an environment that encourages:

- Respectful communication and cooperation between all employees;
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives;
- Work/life balance through flexible work arrangements and remote working to accommodate employees' varying needs; and

- Employer and employee contributions to the communities we serve and designated social organizations, to promote a greater understanding and respect for the diversity.

Aptar wants to have the best available individuals in every job. Aptar is an equal opportunity employer and makes all employment decisions on the basis of merit. Job applicants and employees are evaluated solely on ability, suitability, and the requirements of the job. This policy applies to all aspects of employment, including recruitment, selection, promotion, compensation, benefits, termination, layoff, transfer, leaves of absence and training. In particular, Aptar is committed to eliminating unjustified pay gaps, including on the basis of gender or ethnicity. Aptar monitors and takes reasonable steps to address any such gaps, in compliance with relevant legal and regulatory obligations in the countries in which it operates.

All employees of Aptar have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on and off the work site, and at all other company-sponsored events.

Diversity & Inclusion training and resources will be available to all employees to enhance their knowledge and understanding.

We also expect our partners and suppliers to act in accordance with our values.

## **Harassment**

### *Policy Prohibiting Sexual Harassment*

Aptar prohibits sexual harassment. Any employee found to have engaged in any form of sexual harassment will be subject to discipline, up to and including termination.

For the purpose of this Policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Sexual harassment may include a range of subtle, and not so subtle, behaviors and may involve individuals of the same or different sex. Depending on the circumstances, these behaviors may include, unwanted sexual advances or requests for sexual favors in exchange for employment-related actions, including but not limited to, favorable reviews, assignments, promotions, discipline, or continued employment; unwelcome sexual jokes and innuendo; commentary about an individual's body; leering, catcalls or touching in an inappropriate or sexual manner; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures; other physical, unwelcome flirtation, advances or propositions; and verbal or visual conduct or communications of a sexual nature, including by e-mail, text message or other electronic media.

### *General Policy Prohibiting Harassment*

In addition to prohibiting sexual harassment, Aptar is committed to providing a workplace that is free of all other forms of harassment or bullying. Any employee found to have engaged in any terms of unlawful harassment or bullying will be subject to discipline, up to and including summary termination.

Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of an individual's gender, age, religious belief, sexual orientation, race, ethnicity, national origin, disability, pregnancy/maternity status or any other impermissible criterion or circumstance protected by law or regulation and that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through e-mail, text message or other electronic media).

Bullying is offensive, intimidating, malicious or insulting behavior that, through the abuse or misuse of power, makes the recipient feel vulnerable, upset, humiliated and threatened. Power includes both personal strength and the power to coerce others through fear or intimidation. Bullying is often a form of harassment and can undermine an individual's self-confidence, competence and self-esteem. This can be physical conduct such as perceived horseplay, touching, pinching, pushing as well as grabbing, shoving and punching. Equally bullying can be verbal or non-verbal. The manner in which workers speak to and about one another, written material and pictures (including that disseminated by e-mail, text message, film clips and photographs on mobile phones as well as those uploaded into websites) can all be used to bully. Bullying does not include legitimate and constructive criticism of a worker's performance or behavior or reasonable requests made of workers.

### **Complaints, responsive action and anti-retaliation**

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action. Serious breaches will be treated as gross misconduct as will bullying or sexual or racial harassment and may result in dismissal. Other action taken by Aptar may include, for example, training, referral to counselling, monitoring of the offender and/or corrective action such as warning, reprimand, withholding of a promotion, reduction of wages, demotion, reassignment, suspension without pay, or termination, as we believe appropriate under the circumstances.

An individual who reports incidents that, in good faith, believes to be violations of this policy, or who is involved in or participates in the investigation of a violation of this policy, will not be subject to reprisal or retaliation. Retaliation is not tolerated and any person found to have retaliated against an individual for reporting discriminatory harassment or participating in an investigation of allegations of such conduct will be subject to appropriate disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from a supervisor/manager or an HR representative.

Aptar strongly urges the prompt reporting of complaints or concerns so that we can take rapid and constructive action. Any reported allegations of harassment, discrimination or retaliation will be investigated promptly, thoroughly and impartially. Depending on the nature of the allegation, the investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant

knowledge. Aptar will seek to maintain confidentiality throughout the investigative process to the extent possible, but cannot guarantee complete confidentiality, consistent with our need to comply with applicable law.

Any person who believes that they have been harassed or threatened with or subjected to physical violence in, or related to, the workplace can report the incident to an appropriate supervisor or Human Resources or the Aptar Legal Department, who will arrange for the incident to be investigated. All efforts will be made to handle the investigation confidentially. This applies to all work related interactions whether they take place on Company premises or off-site and whether they take place in person or virtual. Employees can also contact the Aptar Ethics Point Hotline, at <https://aptar.ethicspoint.com> or +1-855-866-3869 (in the United States), to report suspected harassment or other unethical behavior

### **Employee Responsibilities:**

Every employee is responsible for respecting the dignity and diversity of all people and contributing to an inclusive environment that is free from discrimination, harassment and bullying. All employees are also expected to continuously enhance their awareness of diversity and inclusive behaviors such as unconscious bias and others, that might hinder our ability to be more collaborative with one another. These responsibilities include but are not limited to:

- Contacting local Human Resources (HR) or the Aptar Ethics Point Hotline when subject to or aware of discrimination, harassment or bullying by another employee.

### **Manager Responsibilities:**

Managers are accountable for specific Diversity & Inclusion responsibilities and for results achieved as part of their job performance. These responsibilities include but are not limited to:

- Ensuring that employment-related decisions are free from discrimination and that work environments are free from discrimination, harassment and bullying
- Mitigating potential unconscious bias in employment decisions and talent practices (including performance and development, compensation, and hiring).
- Providing reasonable accommodation for qualified individuals with disabilities and individuals with needs related to their religious observance or practices.
- Creating an inclusive and safe work environment that supports D&I and behaviors that reinforce Our Core Values:
  - We respect and trust people.
  - We believe in the self-worth of individuals regardless of their status.
  - We strive for relationships that are based on openness, honesty, and feedback.
  - We promote teamwork and cooperation at all levels.
  - We challenge people to develop their potential and to take initiative.
  - We practice business relationships that are based on responsibility and on long-term and mutual interests to all stakeholders.
- Consistently displaying inclusive leadership behaviors, valuing all perspectives, and listening to diverse points of view
- Role-modelling inclusive and respectful behavior in the work environment and all work-related activities; and encouraging employees to collaborate, make suggestions, and respect and listen to diverse opinions.
- Cultivating a culture of respect for all employees, customers, vendors, contractors and others in the work environment.

- Contacting local Human Resources (HR) when becoming aware of an employee who may be subject to discrimination, harassment or bullying, either by receiving such a complaint or otherwise receiving information about such conduct
- Appropriately addressing any other behavior not consistent with this and/or other policies relating to equal opportunity, diversity, or inclusion.

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