

## **Inclusion, Equity & Belonging Policy**

Aptar is committed to fostering a workplace where all individuals feel valued, respected, and empowered to thrive. Underpinned by our Core Values, we cultivate an environment that embraces inclusion, promotes equity, and nurtures a true sense of belonging. Our Inclusion, Equity and Belonging policy takes account of relevant legal standards driven by our unwavering commitment to both the letter and spirit of equality legislation.

### **Our Commitment to Inclusion, Equity & Belonging**

Our people are our greatest asset. We believe in the self-worth and potential of every individual, recognizing the richness that diversity brings to our organization. Inclusion is not just a principle—it is an intentional and continuous effort that ensures every individual feels valued and heard. By championing diverse perspectives, we strengthen our engagement with employees, 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. This is critical for our business success but also engagement with our customers and suppliers.

Belonging is foundational to our success, 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.

### **How We Foster Inclusion & Belonging**

Aptar is committed to:

- Embedding inclusive policies, strategies, and behaviors that support equity and cultivate a culture where everyone belongs.
- Valuing and leveraging diversity to enable full participation in our work and decision-making processes.
- Eliminating barriers to fairness in recruitment, performance management, professional development, and beyond.
- Taking proactive steps to address inequalities, including conducting periodic assessments to measure and improve outcomes.
- Ensuring that every individual is treated with dignity, respect, and fairness in all interactions.
- Opportunities to participate in employee-led Employee Resource Groups

### **Creating a Workplace Where Everyone Thrives**

Aptar supports an environment that encourages:

- Respectful and meaningful communication among all employees.
- Collaborative teamwork that embraces the perspectives of diverse backgrounds.
- 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 inclusion.

### **Equity in Employment & Pay Practices**

Aptar strives to have the best available individuals in every job. Aptar is an equal opportunity employer committed to ensuring employment decisions are based solely on 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.

We are dedicated to closing unjustified pay gaps and actively monitor equity in compensation, ensuring compliance with legal and regulatory obligations across all regions where we operate.

### **Our Shared Responsibility**

Every Aptar employee plays a role in fostering inclusion and belonging. We expect all employees to uphold these values in their daily interactions, workplace events, and company-sponsored activities. To support this commitment, we provide inclusive training and resources to empower employees with the knowledge and tools needed to create an inclusive workplace. Additionally, we expect our partners and suppliers to align with our values, ensuring a shared commitment to equity and belonging.

### **Harassment: Fostering an Inclusive and Respectful Workplace**

At Aptar, we are committed to maintaining a workplace where every individual feels safe, respected, and valued. Inclusion and equity are fundamental to our success, and we believe that fostering a culture of belonging means eliminating all forms of harassment and bullying.

Aptar prohibits sexual harassment. Sexual harassment undermines the dignity and rights of individuals, disrupts workplace harmony, and will not be tolerated at Aptar. Any employee found to have engaged in sexual harassment will face disciplinary action, up to and including termination.

For the purpose of this policy, sexual harassment includes unwelcome sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made explicitly or implicitly a condition of employment.
- Acceptance or rejection of such conduct influences employment decisions.
- The conduct creates an intimidating, hostile, or offensive work environment, interfering with an individual's ability to thrive.

Sexual harassment may take many forms and can impact individuals regardless of gender. 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 behaviors can include:

- Insulting or offensive remarks, epithets, or stereotypes.
- Threatening, intimidating, or hostile actions that undermine an individual's confidence.
- Spreading discriminatory materials through written, verbal, or electronic communication.

Bullying is offensive, intimidating, malicious or insulting behavior that through the misuse of power can intimidate or humiliate others, making them feel vulnerable, excluded, or unsafe. 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. It can include:

- Physical conduct (e.g., pushing, pinching, grabbing).
- Verbal aggression (e.g., persistent criticism, public humiliation).
- Digital harassment (e.g., manner in which harmful messages or images spread via email, text, film clips, photographs on mobile phones or social media).

Bullying does not include legitimate and constructive criticism of a worker's performance, behavior or reasonable requests made of workers.

### **Complaints, Responsive Action, and Anti-Retaliation Policy: Building a Safe and Inclusive Workplace**

At Aptar, we believe that fostering inclusion, equity and belonging requires a workplace culture where employees feel safe, empowered, and heard. We are committed to addressing concerns swiftly, fairly, and transparently to ensure that everyone experiences dignity and respect in their professional environment.

Aptar maintains a zero-tolerance policy for discrimination, harassment, bullying, or any behavior that threatens the well-being of individuals in our workplace. Any employee found to have engaged in inappropriate conduct, including harassment or bullying, will be held accountable and subject to disciplinary action.

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.

Aptar strongly encourages employees to report concerns promptly to ensure appropriate action can be taken. Employees who report incidents in good faith—or participate in an investigation—will be fully protected from reprisal or retaliation.

We do not tolerate retaliation in any form. Any individual found retaliating against a colleague for reporting discrimination, harassment, or unethical behavior will be subject to disciplinary 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.

### **Support and Reporting Resources**

Employees who believe they have been subject to harassment, bullying, or discrimination—whether in person, virtually, or off-site—should seek assistance from:

- A supervisor, manager, or HR representative for guidance and support.
- Aptar's Legal Department, which will ensure proper handling of complaints.
- The Aptar Ethics Point Hotline: <https://aptar.ethicspoint.com> or +1-855-866-3869 (U.S.), where employees can report suspected harassment or other unethical behavior. Concerns can be reported anonymously.

Aptar is committed to ensuring every employee feels protected, valued, and heard. By upholding these principles, we continue to build a workplace where inclusion, equity and belonging thrive.

### **Employee and Manager Responsibilities: Championing Inclusion, Equity and Belonging**

At Aptar, we recognize that every employee plays a vital role in fostering a workplace culture built on dignity, respect, and inclusion. We are committed to ensuring an equitable and welcoming environment where all individuals feel empowered, valued, and heard.

#### **Employee Responsibilities**

All employees are responsible for:

- Contributing to an inclusive workplace, free from discrimination, harassment, and bullying.
- Respecting the dignity and diversity of all colleagues, ensuring interactions reflect fairness and mutual understanding.
- Strengthening their awareness of inclusive behaviors, including unconscious bias, to create a more collaborative work environment.
- Taking action by reporting any instances of discrimination, harassment, or bullying through appropriate channels, including:
  - Local Human Resources (HR)
  - Aptar Ethics Point Hotline: <https://aptar.ethicspoint.com> or +1-855-866-3869 (U.S.)

#### **Manager Responsibilities**

Managers are accountable for cultivating an environment of inclusion, equity and belonging while ensuring employment decisions remain fair, transparent, and free from discrimination.

Key responsibilities include:

- Creating and sustaining an inclusive and safe workplace that reflects Aptar's Core Values:
  - Respect and trust in all interactions.
  - Belief in the self-worth of every individual.
  - Openness, honesty, and constructive feedback in relationships.
  - Encouraging collaboration and teamwork across all levels.
  - Empowering employees to develop their potential and take initiative.
  - Practicing responsible business relationships that honor long-term and mutual interests.
- Ensuring that employment-related decisions are free from discrimination and that work environments are free from discrimination, harassment and bullying

- Championing inclusive leadership, valuing all perspectives, and listening to diverse viewpoints.
- Mitigating and eliminating unconscious bias in hiring, promotions, compensation, performance management, and professional development.
- Providing reasonable accommodations for qualified individuals with disabilities and individuals with needs related to their religious observance or practices.
- Role-modeling respectful and inclusive behaviors in all workplace interactions.
- Ensuring employees feel heard and engaged, fostering an environment that celebrates diverse ideas and contributions.
- Swiftly addressing concerns related to discrimination, harassment, or bullying by:
  - Receiving complaints and concerns with empathy and impartiality.
  - Escalating complaints and concerns to Human Resources as needed.
  - Appropriately addressing any other behavior not consistent with this policy and taking corrective action where necessary to uphold a culture of inclusion, equity and belonging.
- Cultivating a culture of respect for all employees, customers, vendors, contractors and others in the work environment.

By committing to these responsibilities, we create a workplace where every individual thrives, contributing to Aptar's vision of a more inclusive, equitable, and culture of belonging.