



ETPA Packaging AEEE Ethics Policy

ALL CONCERNS REPORTED ARE CONFIDENTIAL

Code of Ethics Policy Statement

ETPA Packaging AEEE maintains certain policies to guide its employees with respect to standards of conduct expected in areas where improper activities could damage the company's reputation and otherwise result in serious adverse consequences to the company and to employees involved. The purpose of this policy is to affirm, in a comprehensive statement, required standards of conduct and practices with respect to certain types of payments and political contributions.

An employee's actions under this policy are significant indications of the individual's judgment and competence. Accordingly, those actions constitute an important element in the evaluation of the employee for position assignments and promotion. Correspondingly, insensitivity to or disregard of the principles of this policy will be grounds for appropriate management disciplinary action.

Employees...

...we are committed to honesty, fairness, and providing a safe and healthy working environment that respects the dignity due everyone.

Customers...

...we are committed to providing complete confidentiality, attention to detail, reliable product delivery, and uncompromising service at a fair price.

Suppliers and partners...

...we are committed to fair competition and the sense of responsibility required of a good customer and teammate.



Obeying the Law

We will conduct our business in accordance with all applicable laws and regulations. Compliance with the law does not comprise our entire ethical responsibility; rather, it defines our minimum, absolutely essential performance of our duties.

Promoting a Positive Workplace

All employees want and deserve a workplace in which they feel respected, satisfied and appreciated.

The company will not tolerate harassment or discrimination of any kind - especially involving race, color, religion, gender, age, national origin, sexual orientation or disability.

Our goal is excellence in the workplace and an environment that supports honesty, integrity, respect, trust and responsibility. In addition, citizenship is everyone's responsibility. While everyone who works for the company must contribute to the creation and maintenance of this environment, our executives and management personnel are charged with special responsibilities for fostering a work environment that is free from the fear of retribution. Managers and team leaders must be careful in words and conduct to avoid placing, or

seeming to place, pressure on subordinates that could cause them to deviate from acceptable ethical behavior.

Keeping Accurate and Complete Records

We must maintain accurate and complete company records. Transactions between the company and outside individuals and organizations must be promptly and accurately entered in our books in accordance with generally accepted accounting practices (GAAP) and principles. No one should rationalize or even consider misrepresenting facts or falsifying records. It will not be tolerated and will result in disciplinary action, including the possibility of immediate termination of employment.

Recording Costs Properly

Employees and their supervisors are responsible for ensuring that labor costs are accurately recorded. No one should time-in or -out for another employee, and managers should insure that all normal work, work related to independent research and development, and general activities are charged appropriately.

Bidding, Negotiating and Performing Contracts

We will compete fairly and ethically for all business opportunities.

If an employee is involved in the preparation of proposals or contract negotiations, he or she must be certain that all statements, communications and representations to prospective customers are accurate and truthful. Once executed, all contracts must be performed in compliance with specifications, requirements, and clauses.



If an employee is involved in the negotiations for goods and services and receives proposals, bids or contracts for negotiation, the company requires a minimum of two competitive bids for each contract or acquisition above €500 in value. It is the employee's responsibility to ensure that all business opportunities are transacted honestly and in the best interest of the company and our partners.

Prohibition of Improper Payments

The company expects all employees to use only legitimate practices in commercial operations and in promoting the company position on issues before governmental authorities. As stated below, "kickbacks" or "bribes" intended to induce or reward favorable buying decisions and governmental actions are unacceptable and prohibited.

No employee of the company or any controlled affiliate acting on the company's behalf shall, in violation of any applicable law, offer or make directly or indirectly through any other person or firm, any payment of anything of value (in the form of compensation, gift, contribution or otherwise) to:

- f* Any person or firm employed by or acting for or on behalf of any customer, whether private or governmental, for the purpose of inducing or rewarding any favorable action by the customer in any commercial transaction; or any governmental entity, for the purpose of inducing or rewarding action (or withholding of action) by a governmental entity in any governmental matter.
- f* Any governmental official, political party or official of such party, or any candidate for political office, for the purpose of inducing or rewarding favorable action (or withholding of action) or the exercise of influence by such official, party or candidate in any commercial transaction or in any governmental matter.

In utilizing consultants, agents, sales representatives or others, the company will employ only reputable, qualified individuals or firms under compensation arrangements which are reasonable in relation to the services performed.

Consultants, agents or representatives retained in relation to the provision of goods or services to the federal government must agree to comply with all laws, regulations and company policies governing employee conduct.

The provisions of this section are not intended to apply to ordinary and reasonable business entertainment or gifts not of substantial value, customary in local business relationships and not in violation of law as applied in that environment. In some countries (but not in all countries), it may be acceptable to make



such insubstantial gifts to minor government officials where customary in order to expedite or secure routine administrative action required in the orderly conduct of operations. Managers are expected to exercise sound discretion and control in authorizing such business entertainment and gifts.

When customer organizations, governmental agencies or others have published policies intended to provide guidance with respect to acceptance of entertainment, gifts or other business courtesies by their employees, such policies shall be respected.

Reports and Periodic Reviews

Any employee who is requested to make, authorize, or agree to any offer or payment which is, or may be, contrary to this policy will promptly report such information to the employee's manager, to assigned company legal counsel or to the manager in the component having responsibility for financial activity.

Any employee who acquires information (for example, newspaper reports, reports from customers, or statements of individuals involved) that gives the employee reason to believe that any employee is engaged in conduct forbidden by this policy, or that any sales representative, distributor or other person or firm representing the company in any transaction is engaged in the type of conduct (whether or not in connection with a transaction involving the company or its products) which, if engaged in by an employee of the company, would violate this policy, will promptly report such information to the employee's manager, to assigned company legal counsel, or to the manager in the component having responsibility for financial activity.

Any manager receiving a report as cited above will promptly consult with assigned company legal counsel and thereafter will, after appropriate investigation, take timely remedial or other action as warranted under the provisions of this policy. Such manager will also promptly report the matter to higher management.

Compliance with Antitrust Laws

For many years, ETPA Packaging AEEE has recognized a need to single out compliance with the antitrust laws of the EU and other countries as a subject requiring a specific company policy. The antitrust laws are relevant to many business decisions, and the consequences of violations anywhere can be seriously injurious to the company and to individuals involved.

Several provisions of the antitrust laws of the EU contain penal provisions under which employees who authorize or engage in acts in violation of such laws are personally subject to substantial fines and imprisonment. There are also in existence a number of antitrust decrees affecting the company and its employees. Violation of any one of the provisions of these decrees is an offense which may subject the



company and the individuals involved to severe penalties.

Each manager must accept the challenge to have the company excel competitively at the point of market confrontation. Apart from legal penalties, company growth and profitability objectives would be frustrated by arrangements with other business firms which restrict its competitive initiative.

Officers, managers and other key employees are expected to develop in employees a sense of commitment to comply with this policy. The antitrust compliance environment within such a key employee's assigned area of responsibility will be a significant factor in evaluating the quality of that individual's performance.

Statement of Policy:

It is the objective of the company to comply with the antitrust laws of the EU and other countries applicable to its business operations, and to hold employees in management positions personally and strictly accountable for taking the measures necessary to achieve this objective within their areas of responsibility.

Discussions and Exchange of Information with Competitors

Communication with a competitor on subjects as to which an understanding with the competitor would be illegal is, in antitrust legislation, likely to serve as important evidence of the existence of an understanding, particularly if the communication is accompanied or followed by similarity of action. The prohibitions set forth below are thus intended to avoid antitrust prosecutions which, though based on merely circumstantial evidence, may nevertheless be difficult to defend successfully.

Conduct with Vendors and Suppliers

Relationships with vendors and suppliers are handled in a fair and reasonable manner, consistent with all applicable laws and good business practices. Vendors and suppliers are selected on the basis of objective criteria, including standards of quality, service, price, delivery capability and technical excellence. ETPA Packaging AEEE actively pursues competitive bidding through available resources including national group purchasing affiliations, regional and local alliances. All purchasing decisions are based on price, and other parameters according to the company procedures and the supplier's abilities to meet our needs. Under no circumstances are decisions based on personal relationships, whether the relationship involves the employee, an officer or director of ETPA Packaging AEEE, a family member or a friend. We employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards and the administration of all purchasing activities. ETPA Packaging AEEE does not knowingly enter into contracts or do business with vendors convicted of a criminal offense.



ETPA Packaging AEEE does business with only those vendors and suppliers that comply with applicable laws and whose business conduct is consistent with our Code of Ethics Policy and compliance program.

In addition to ETPA Packaging AEEE's Code of Ethics Policy Statement written above, clients of ETPA Packaging AEEE may require that the ETPA Packaging AEEE suppliers review their specific Code of Ethics (also known as Code of Conduct, Conflict of Interest, etc.). These policies will be distributed to applicable suppliers and stakeholders through the info shared in the company website.

Business Courtesies to Our Employees

Meals, Refreshments, and Entertainment

Although an employee may not use his or her position at our company to obtain business courtesies, it is permissible to accept unsolicited meals, refreshments, entertainment, and other business courtesies on an occasional basis, provided:

- The acceptance will foster goodwill and successful business relations;
- The courtesies are not lavish or extravagant under the circumstances;
- The courtesies are not frequent and do not reflect a pattern or the appearance of a pattern of frequent acceptance of courtesies from the same entities or persons; and
- The employee accepting the courtesies would feel comfortable about discussing the courtesies with his or her manager or co-worker, or having the courtesies known by the public.

It is the personal responsibility of each employee to ensure that his or her acceptance of such meals, refreshments, or entertainment is proper and could not reasonably be construed in any way as an attempt by the offering party to secure favorable treatment.

Steer Clear of Conflicts of Interest

Playing favorites or having conflicts of interest—in practice or in appearance—runs counter to the fair treatment to which we are all entitled. Avoid any relationship, influence, or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. Conflict of interest laws and regulations must be fully and carefully observed. When in doubt, consult company policies and procedures, and share the facts of the situation with your supervisor or Ethics/Quality Officer. Here are some ways a conflict of interest could arise:

- Employment by a competitor or potential competitor, regardless of the nature of the employment, while employed by this company.
- Acceptance of gifts, payment, or services from those seeking to do business with our company.
- Placement of business with firm owned or controlled by an employee or his/her family.
- Ownership of, or substantial interest in, a company that is a competitor or a supplier.
- Acting as a consultant to a customer or supplier.



Maintain the Integrity of Consultants, Agents, and Representatives

Business integrity is a key standard for the selection and retention of those who represent our company. Paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party without authority, or gaining inside information or influence are just a few examples of what could give us an unfair competitive advantage and could result in violations of law

Protect Confidential and Proprietary Information

Confidential client or alliance partner information, confidential information provided by reporters, and proprietary company information may not be disclosed to anyone without proper authorization. It is absolutely imperative that proprietary and confidential documents be kept in a protected and secure manner. In the course of normal business activities suppliers, clients and competitors may sometimes divulge to you information that is proprietary to their business. Respect these confidences.

Obtain and Use Company Assets Wisely

Proper use of company property, electronic communication systems, information resources, material, facilities and equipment is your responsibility. Use and maintain these assets with the utmost care and respect, guarding against waste and abuse, and never borrow or remove them from company property without management's permission. Be cost-conscious and alert to opportunities for improving performance while reducing costs. While the assets are intended to be used for the conduct of our business, it is recognized that occasional personal use by employees may occur without adversely affecting the interests of the company. Personal use of company assets must always be in accordance with corporate and company policy. Consult your supervisor for appropriate guidance and permission.

All employees are responsible for complying with requirements of software copyright licenses related to software packages used in fulfilling job requirements.

Warnings Signs: You're on Thin Ethical Ice When You Hear...

- "Well, maybe just this once..."
- "No one will ever know..."
- "It doesn't matter how it gets done as long as it gets done."
- "It sounds too good to be true."
- "Everyone does it."
- "Shred that document."
- "We can hide it."
- "No one will get hurt."



- "What's in it for me?"
- "We didn't have this conversation."

You can probably think of many more phrases that raise warning flags. If you find yourself using any of these expressions, take the quick quiz below and make sure you are on solid ethical ground.

Quick Quiz: When in Doubt, Ask Yourself...

- Are my actions legal?
- Am I being fair and honest?
- Will my action stand the test of time?
- How will I feel about myself afterward?
- How will it look in the newspaper?
- Will I sleep soundly tonight?
- How would I feel if my family, friends and neighbors knew what I was doing?

If you are still not sure what to do, ask...and keep asking... until you are certain you are doing the right thing.

Our Goal: An Ethical Work Environment

We have established a Code of Conduct, a corporate Ethics Policy, and have appointed an associate of the company charged with the responsibility of monitoring and perfecting this process. This vigorous, corporate-wide effort to promote a positive, ethical work environment underscores our commitment to ethical conduct throughout our company.

Our Ethics / Quality Officer oversees the functioning of the system throughout the company. You are urged to use this resource whenever you have a question or concern that cannot be readily addressed within your work group or through your supervisor.

Violations of the Policy

A. Violations of the policy are grounds for discharge or other disciplinary action, adapted to the circumstances of the particular violation and having as a primary objective furtherance of the company's interest in preventing violations and making clear that violations are neither tolerated nor condoned.

B. Disciplinary action will be taken, not only against individuals who authorize or participate directly in a violation of the Policy, but also against:

- (1) any employee who may have deliberately failed to report a violation of the policy;
- (2) any employee who may have deliberately withheld relevant and material information concerning a violation of this policy;
- (3) and the violator's managerial superiors, to the extent that the circumstances of the violation reflect inadequate leadership and lack of diligence.



C. Where an employee is accused of violating the antitrust laws, and the employee has relied in good faith on the advice of company legal counsel after full disclosure of the material facts, no disciplinary action may be taken against the employee under this policy; the company may, within the limits permitted by law, assist in the employee's defense.

Reports and Periodic Reviews

A. Any employee who is requested to engage in any activity which is or may be contrary to this policy will promptly report such information to the manager to whom the individual reports, or, if the employee was so directed by the manager, then to assigned company legal counsel.

B. Any employee who acquires information that gives the employee reason to believe that any other employee is engaged in conduct forbidden by the policy will promptly report such information to the manager to whom the employee reports or, if the manager is engaged in such conduct, then to the assigned company legal counsel.

When you contact your Company Ethics / Quality Officer:

- You will be treated with dignity and respect.
- Your communication will be protected to the greatest extent possible.
- Your concerns will be seriously addressed and, if not resolved at the time you call, you will be informed of the outcome.
- You need not identify yourself.

Contact details: Tel. 210 2856720 (internal 122), email: qa@etpapackaging.com