

Code of Conduct

Preamble

As a manufacturer of flexible packaging with international value chains, the ppg> Group is aware of its responsibility for sustainable business practices. Fair, entrepreneurial, and innovative conduct is a core element of our corporate philosophy. It is part of our identity to adhere to ethical standards and to consider the environmental, social, and economic impacts of our business processes.

This Code of Conduct serves as a guideline for the daily actions and conduct of all employees, managers, suppliers and service providers of the ppg> Group.

The requirements and minimum standards described below are based on the United Nations Guiding Principles on Business and Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO).

The basis for this is the GKV Code of Conduct for the plastics processing industry.



I. General regulations

1. Validity

This code of conduct is valid for all branches and production sites of the company.

2. Laws, standards and ethic behaviour

The company adheres to the valid laws and standards of the respective countries it is active in. It takes guidance from the general ethic values and principles, especially integrity, righteousness as well as human dignity.

3. Business partners, authorities and consumers

The company practices according to the generally recognised business practices of fairness and honesty. It deals truthfully with authorities. Standards protecting consumers are adhered to.

The company avoids conflicts of interest, whether internal or external, if they can influence the business relationship in an unobjective way. Unavoidable conflicts are disclosed to the business partner without being asked.

4. Trade secrets

Trade secrets of business partners will be treated strictly confidentially by companies and their members. Passing on confidential information to third parties or making this information publicly available is forbidden. This continues to be the case for company members even after the employment has been terminated.

5. Reporting and transparency

Internal and external reports and documents of the company, in particular also financial information, represent complete, appropriate and timely as well as comprehensible representations about the company. They are prepared in accordance with recognised accounting principles as well as appropriately recognised control systems.

6. Responsibility in the supply chain

The company is aware that responsible behaviour is becoming increasingly important within supply chains. The selection of our suppliers takes into account, as far as possible, whether they are also committed to acting responsibly and apply either this or an equivalent code of conduct.

II. Antitrust and competition law guidelines

1. Antitrust law

The company is committed to a fair competition. Laws protecting fair competition, particularly antitrust law and other competition regulating laws, are adhered to.

Collusion on prices or other conditions, sales areas or customers as well as misuse of market power contradict the principles of the company.

2. Bribery, bribability and corruption

The company opposes bribery and corruption and does not tolerate such behaviour.

The employees are to take care not to create personal dependencies or obligations towards customers or suppliers. In particular, employees are not allowed to accept or make gifts which, under reasonable contemplation, could influence business decisions.

In case gifts are part of a country's custom, it is important to note that no binding dependencies are created and local legal standards are adhered to.

Contravention will routinely have legal consequences.

3. Money laundering

The company complies with the legal obligations to prevent money laundering and does not participate in transactions that serve to conceal criminal or illegally acquired assets.

Before entering into business relationships, the company checks the identity and seriousness of its business partners. When making payments to or from business partners, it looks for warning signs of money laundering. Business processes are dutifully documented.

III. Global guidelines

1. Human Rights

Internationally recognised human rights¹ are supported explicitly and consistently.

Equally, in the case of disciplinary measures, all company personnel are to be treated with dignity and respect. Such measures must only take place in accordance with the current national and international standards and internationally recognised human rights¹.

2. Child Labour

Child labour and any kind of exploitation of children and adolescents is rejected. The corresponding laws are adhered to.

3. Forced labour

Any kind of forced labour, debt bondage, slave work or slavery or similar situations are rejected. Company members must not be forced to work through means of violence or intimidation, neither directly nor indirectly².

4. Wages

All employees in full time employment shall receive a fair salary covering at least their basic needs. The wages are to be paid in a practical way (cash, cheque, bank transfer) and payroll accounting has to be made available to a reasonable extent³. The right of employees to freedom of association, freedom of assembly and collective bargaining in as far as this is legally admissible and possible in the respective country, shall be respected⁴.

5. Working hours

Working hours correspond to valid national laws, industry standards or relevant ILO conventions. Extra work has to be done on a voluntarily basis⁵.

6. Health and employment protection

The national and international regulations for securing health and safety at work are adhered to. Relevant systems to avoid risks for health and safety are to be set up⁶.

7. Environmental protection

The company adheres to the goals of sustainable environmental protection. Environmentally friendly production methods are aimed for in this context. In accordance with the principles of the Rio Declaration on Environment and Development of the United Nations⁷, the company deals responsibly with natural resources.

IV. Ethical and social principles

1. Non-discrimination

The company opposes discrimination on employment or occupation, in particular a discrimination because of race, ethnic or national origins, colour of skin, gender, or mental and physical disability, age, creed, membership of a trade union or any other personal traits⁸.

2. Molestation

The company disapproves of physical, psychological or sexual violence.

3. Freedom of opinion

The right to freedom of opinion and free expression of opinion is warranted.

4. Privacy

Privacy is respected.

V. Observance of the code of conduct

1. Measures

The company presents the code of conduct to company members in a suitable form and given intervals, and ensures that it is adhered to.

2. Certification

A requirement for the certification is a regular survey of members taken every two years within the framework of self-disclosure.

The certified companies can be made public in an appropriate way through the GKV and its member associations. The participating companies acquire the right to use the GKV logo for the Code of Conduct.

If the companies do not fulfil or cease to fulfil the certification requirements, membership within the compliance initiative will be withdrawn.

Footnotes:

¹ General Declaration of Human Rights – UN-Doc. 217, UN Human Rights Charter.

² See. ILO Conventions 29 and 105

³ See. ILO Conventions 26 and 131

⁴ See ILO Convention 87 of 1948 and 98 of 1949 Vgl. ILO-Konventionen 29 und 105

⁵ See ILO Conventions 1 and 14

⁶ See ILO Convention 155

⁷ 27 principles of the Rio Declaration on Environment and Development, decided upon by the United Nations

Conference on Environment and Development (UNCED), Rio de Janeiro, 1992

⁸ See ILO Conventions 100, 111, 158 and 159