



Plastic Products International Ltd BUSINESS ETHICS POLICY

Introduction

Ethical business practice is one of the guiding principles of the Plastic Products International Ltd. The company is committed to ethical business conduct and expects the highest standards of integrity to be followed by all employees in each of its businesses wherever work is undertaken, globally.

This Business Ethics Policy (“this Policy”) specifies the standard of behavior the company expects from its employees, and others acting on its behalf, when conducting business on behalf of the company. It applies in addition to the other policies, procedures, codes and statements that have been issued by the company.

Business ethics and legal compliance

The Company requires all employees to conduct business with honesty and integrity. It is the company’s policy to comply with this requirement in all aspects of its business, and to ensure compliance by its employees and agents with all applicable legal and ethical standards of each country, state, province or local jurisdiction in which the Company’s business is conducted.

Duty to report non-compliance

If employees have knowledge of any activities which they have reason to believe may violate this Policy, they must report such activities immediately. Plastic Products International Ltd relies on its employees’ vigilance to notify it when something isn’t quite right. Employees are able to raise their concerns with their line managers or the Company Directors.

Conflicts of interest

The integrity of all employees must be capable of scrutiny at all times. While the Company respects the right of employees to privacy in their personal activities and financial affairs, employees must not have personal interests which conflict, or could conflict, with those of the Company.

Gifts and hospitality

All gifts and hospitality given or received by an employee must comply with the Company’ Anti-Bribery Policy, section Gifts and Hospitality.

Improper payments

No employee may offer, pay, promise or authorise the payment of money or anything of value to any other person where (s)he knows or believes that the money or thing of value will be improperly given or promised in order to obtain, retain, facilitate or expedite business for the Company. No payments may be made for the purpose of improperly influencing the action or decision of the recipient, inducing the recipient to do or refrain from doing any act in breach of his or her lawful duty, or inducing the recipient to exert influence on any foreign government or its department or agency. The Company has a zero tolerance policy to bribery and corruption, as per the Company’s Anti-Bribery Policy and awareness of this is made to all staff.

Compliance with laws prohibiting anti-competitive activity

The Company complies with all aspects of competition law, globally. The Company’s policy and procedure to ensure no anticompetitive contact takes place is available to all employees.

Political contributions and activities

The Company makes no political contributions and is not affiliated to any political party.

Supplier relations

Our relationships with the people and organisations that supply goods or services to the Company are of paramount importance. Suppliers are selected impartially, on the basis of price, quality, performance and suitability of product or services.

Health, safety and environmental protection

Employees are responsible for conducting the Company's business in a manner that protects the health and safety of Company's employees and the public, as well as the environment. They should act at all times in a manner that ensures the Company complies with all applicable health, safety and environmental requirements. Please refer to the Company's Health and Safety and Environmental Policies.

Equality, diversity and inclusion

The Company values the diversity provided by gender, race, colour, ethnic or national origin, sexual orientation, religion, or marital status. The principles and practices of equal employment opportunity and workforce diversity contribute to the achievement of the Company's business objectives. Please refer to the Company's Equality and Diversity Policy. The Company expects its employees to maintain a workplace that is free from any form of discrimination, harassment or bullying.

Human rights

The company's business activities are pursued with respect for human rights. As such, it needs to ensure and to demonstrate that it treats all employees and contractors fairly, legally, with respect and with dignity. The Company endeavours to operate in a manner consistent with the principles of the United Nations Universal Declaration of Human Rights and the core International Labour Organisation Convention areas (freedom of association, collective bargaining, non-discrimination, prohibition of child labour and of forced labour). We will not participate in, contribute to or obtain information from any blacklist or other similar service which undermines these principles and as part of this obligation we will ensure that compliance with our Equality and Diversity Policy, as well as this Business Ethics Policy, will form part of the selection process for appointing subcontractors and other members of our supply chain.

Confidentiality

During the course of employment, employees may acquire information not generally known to the public, including knowledge of a commercially sensitive nature, business plans or outlook, marketing or sales programmes, customer lists, significant new services or price changes, mergers and acquisitions, offering or redemption of shares, changes in management and other proprietary and confidential information. Employees must not disclose, during or after their employment by the Company, any non-public information regarding the company's business or operations to any outsider unless disclosure is authorised in writing by Senior Management. Business Ethics Policy Owner. Whenever possible, authorised third party recipients of the Company's confidential information should be required in advance to execute agreements acknowledging their confidentiality obligations to the Company. The terms and conditions of employment for all employees make it clear that all information which becomes available as a direct result of their employment is confidential to the Company and should not be disclosed except as required in order to achieve the Company's business objectives. The company undertakes to protect the personal data of all persons with whom it holds a record in accordance with the Data Protection Act 1998.

Personal conduct outside the workplace

Plastic Products International Ltd.'s reputation as a company depends largely upon its staff and how they interact with stakeholders within and outside of the organisation as well as how they behave in the public domain outside their place of work.

Communications – new media relations

It is important that inquiries from the news media are properly handled in order to maintain effective public relations and to protect the Company's competitive position and propriety information. Employees must not discuss Company business with any member of the news media, even on an informal basis. This will minimise news stories based on rumour or unofficial "tips" which can be damaging to the Company's best interest. All requests for information from the news media (including, in particular, those relating to financial or commercial matters) must be referred to the Company's Directors.

Communications – email, internet and social media

Employees are required to follow the provisions detailed in the Company's Employee Handbook, as well as the company's Safeguards policies (and related guidelines), when using email and the internet. Management has responsibility on a day to day basis for ensuring that access to the business systems is used prudently. Managers must ensure that contract or temporary staff are informed and familiar with these policies and that they agree to be bound by the terms listed.

Key issues with regard to the use of these IT facilities are:

- Misuse of email, internet or social media for personal communications;
- Risk of defamation by an individual or organisation;
- Bringing into the workplace via email, the internet or social media material of a racist, pornographic, sexist, obscene, abusive, defamatory or other inappropriate nature or material that may be in breach of copyright;
- Unwittingly creating a binding contract with a supplier, client, etc.;
- Knowingly introducing a virus to company equipment or forwarding a virus.

Other policies etc.

Elements of ethical business practices are referred to in many other Company publications and several of the topics raised in this Policy also appear in more detailed and defined policies, procedures, codes and/or statements already in place within the Company. Similarly, the Company participation in third party bodies or groups create certain obligations that contribute to the Company's ethical business commitments. In this context, where any questions or doubts arise over the interpretation of this Policy, please refer in the first instance to the appropriate subject-specific policy (or procedure guidance, if applicable). Employees should also contact the Company Directors. Other affiliated Company policies and statements, all of which are available on request or via the internal company intranet, include the following:

- Ethical conduct Policy
- Modern slavery statement
- Child Labour Policy
- Anti-Bribery Policy
- Anti-Tax Evasion Policy
- Whistle Blowing Procedure
- Equality & Diversity Policy
- Bullying & Harassment Policy
- Environmental Policy.

Further Information If you have any questions concerning this policy or would like further guidance, please refer to Plastic Products International Code of Conduct, or contact Keith Smith, Company Director, Plastic Products International Ltd, Capital Place, Love Road, Harlow, Essex CM19 5AS. +44 (0)1279 445041 E: info@ppiuk.net