

Anti-Bribery and Corruption Policy

Introduction

Kleopatra Holdings 2 Luxembourg and its subsidiaries, including Klöckner Pentaplast of America, Inc. and its subsidiaries (hereafter referred to as "**Klöckner Pentaplast**" or the "**Company**") must conduct its business in accordance with international Anti-Bribery and Corruption legislation, including the US Foreign Corrupt Practices Act 1977 (as amended), the UK Bribery Act 2010, the applicable German legislation and with the Anti-Bribery and Corruption laws of all other countries where the Company does business directly or through intermediaries, agents, distributors and any other third party.

For the purposes of this Policy, reference to "the Company" shall include its directors, officers, employees and agents. The Company is committed to conducting its business in a fair and ethical way, without using bribes or corrupt practices to obtain unfair advantages in its business dealings. Accordingly Bribery, and any other forms of unethical business practice, is strictly prohibited. When working for the Company, all employees and third parties (directors, agents, representatives, distributors, joint-venture partners and any other parties) acting in any capacity in the name of, or on behalf of the Company in any jurisdictions are required to uphold this commitment by understanding the requirements of this Anti-Bribery and Corruption Policy and by always following the Company's standards, instructions and processes. Bribery not only violates the Company's Anti-Bribery and Corruption Policy and Code of Business Conduct and Ethics, it violates the law and can have very serious consequences.

The Anti-Bribery and Corruption Policy ("the ABC-Policy")

1. The Company will not engage in Bribery or Corruption in any form, whether it involves private companies or Public Officials.
2. The Company will not directly or indirectly accept, request, agree to receive, promise, offer or give a bribe or other improper payment.
3. The Company will not tolerate employees or directors, agents, representatives, distributors, joint-venture partners or any other parties acting in any capacity in the name of, or on behalf of the Company in any jurisdictions, who pay bribes or otherwise violate this Policy.

This Policy reflects the commitment by the Company's directors and senior management to establish and maintain a corporate culture of zero-tolerance against Bribery and Corruption. As part of this

commitment, the senior management of the Company meets regularly with the Compliance Officer, to discuss and oversee the administration and implementation of this Policy.

This Policy must be read in conjunction with the Company's Code of Business Conduct and Ethics ("**Code of Conduct**") and any other relevant compliance document and material (including any training material) made available to you from time to time by the Company.

Queries

The Company's Compliance Officer is responsible for the administration and the implementation of this Policy. All questions and queries about the scope and the application and this Policy must be addressed to your Local Reporting Manager, the Regional Compliance Manager or to:

Tom Dowling / Compliance Officer

Klöckner Pentaplast Group

3585 Klöckner Road

Gordonsville, VA 22942

U.S.A.

Phone: +1 540 832 9161

Email : t.dowling@kpfilms.com or compliance @kpfilms.com

Irrespective of the roles and responsibilities set out in this Policy you may contact the Compliance Officer at any time with any questions or suggestions you might have in regard to this Policy.

To whom does this Policy apply to?

The provisions and procedures contained in this Policy must be followed by the Company and all of its employees and directors, agents, representatives, distributors, joint-venture partners, and any other parties acting in any capacity in the name of, or on behalf of, the Company in any jurisdictions.

It is your responsibility to follow the spirit as well as the letter of this Policy. It is a condition of employment and your contract with the Company that you do so. Failure to comply will be treated as serious misconduct and will be subject to disciplinary action and/or may include a termination of contract. Failure to comply with this Policy could also have serious consequences for you and for the Company, including criminal, administrative and regulatory sanctions.

This Policy is not designed to be a comprehensive guide to Anti-Bribery and Corruption compliance. It is intended to help you to recognize potential Bribery and Corruption issues, to give you guidance on acceptable and unacceptable behavior and to tell you where to find for further information. Questions about the application of this Policy, including questions about situations not specifically

addressed in it, should be addressed to your Local Reporting Manager or the Regional Compliance Manager.

Failing to abide by the procedures included in this Policy due to ignorance or misunderstanding will not be accepted as an excuse. If you do not understand or cannot comply with any part of the Policy, you should immediately advise your Local Reporting Manager or the Regional Compliance Manager (see attached Anti-Bribery and Corruption Organization Chart), who will provide guidance on the issue.

This Policy has been approved by the Company's Board of Directors. Any waiver of or amendment to this Policy may be made by the Compliance Officer acting under the authority of the Board of Directors of the Company. Any review or amendment will be notified to you in writing by the Compliance Officer and included in the List of Amendments to the Policy, which shall be reflected in the last page of this Policy.

Please read this Policy carefully and acknowledge that you have read it and will comply with it by signing and returning the Acknowledgement (set out on the following page) to your Local Reporting Manager.

ACKNOWLEDGEMENT

I have received and read a copy of the Klöckner Pentaplast ABC-Policy and I agree to comply with the principles, policies and procedures described in the Policy, and with any amendments, memos and training material issued and made available to me from time to time.

Each year I will provide Klöckner Pentaplast with a certificate regarding my compliance with this ABC-Policy.

Should you have any queries as to the obligations set out in the Policy, you should contact your Local Reporting Manager / the Regional Compliance Manager before signing.

Name: _____
(Please print)

Employee ref.-no: _____

Signature: _____

Date: _____

1. What is Bribery and Corruption?

Bribery and Corruption have a range of definitions in law, but there are some universal principles to bear in mind:

- **Bribery** - is the offering, promising, giving, requesting or acceptance of an advantage or inducement in return for an act which is illegal, unethical or a breach of trust.
- **Corruption** - is the misuse of public office or power for private gain.

Bribes can take on many different forms and do not necessarily involve the payment of cash. A bribe can be anything of value for example:

- **Kickbacks** - where a percentage from the contract or other financial award is improperly returned to the person awarding that contract or benefit, e.g. company wins a new contract by promising to pay the customer's representative a cash payment.
- **Inflated commissions** - where higher than normal commissions are paid as a reward for improper behavior, e.g. paying an agent extra commission knowing that it will be used to bribe a distributor.
- **Political or charitable donations** - can be used as bribes, e.g. making a donation to a political party to support legislation that is favorable to the company.
- **Excessive or inappropriate entertainment** - can be used to influence business contacts, e.g. giving a company director and his family an expensive holiday before he makes a decision to assign a contract where the company has submitted a tender.
- **Expensive gifts** - can be given to influence the recipient, e.g. giving an expensive iPad to a distributor so that they will stock the company's products.
- **Facilitation payments or "grease" payments** - usually small non-discretionary payments to government / public officials to speed up routine administrative processes, e.g. giving a government official boxes of cigarettes to process permits for the Company ahead of others. No distinction is made between bribes and facilitation payments; both are prohibited.

If you have any doubt as to whether an action might constitute bribery or corruption, you must immediately consult your Local Reporting Manager or the Regional Compliance Manager.

2. The law on Bribery and Corruption

Bribery and Corruption are criminal offences in most countries in which the Company operates, and penalties can be severe for individuals (imprisonment) and could cause serious damage to the Company's brand and reputation (substantial fines, debarment from competing for public contracts or participating in tenders in one or more jurisdictions). It is therefore important that you understand how Bribery and Corruption might be committed.

In addition to having laws that prohibit Bribery and Corruption, an increasing number of countries are adopting laws to punish Bribery and Corruption even when it is committed outside their own borders. The US Foreign Corrupt Practices Act 1977 (as amended) ("**FCPA**") and the UK Bribery Act 2010 ("**UKBA**") have such laws; for example, it is an offence in the US to bribe a Foreign Public Official. As the Company operates in a number of different countries, it is governed by these laws in addition to any local Anti-Bribery and Corruption laws.

Compliance is also a key concern to many of our customers who, through their terms of engagement with the Company, expect us to comply with internationally accepted standards of behavior. These requirements are motivated by the customers' own legal obligations, by their own code of ethics in relation to dealings with their business associates and for reasons of good governance. Failure to comply may therefore result in the termination of contract, loss of business to the Company and possibly claims for loss or damage by our contractual counterparties. It is therefore in your interests, as well as the Company's, that you are aware of the legal risks and do not directly or indirectly engage in any acts of Bribery or Corruption.

The UK Bribery Act 2010 ("**UKBA**") is widely recognized to be one of the strictest forms of legislation internationally on Bribery. Therefore as a matter of good practice this Policy has been prepared taking into consideration the requirements imposed by the UKBA.

The following are some of the key points to remember about Anti-Bribery and Corruption laws that apply to the Company:

- It is an offence for companies and individuals to directly or indirectly bribe another person receive a bribe or bribe a Foreign Public Official; e.g. making cash payments to a competitor to drop out of a tender process could be considered a bribe.
- It is an offence to bribe in both the private sector and public sector; e.g. bribing a customer or bribing a Public Official.
- To "indirectly bribe another person" involves offering or giving something of value to a third party acting on your behalf, knowing or intending, that the third party will go on to bribe another; e.g. paying an agent an increased commission with the intention that they will use the extra payment to bribe customs officials to speed up clearance of a company's products through Customs.
- It is unlawful to offer a bribe, regardless of whether the offer is accepted or a benefit gained; e.g. offering a meal to a Public Official, which is refused, intending to persuade them to grant a permit.
- Under the UKBA, in certain circumstances, a company could be prosecuted for failing to prevent "associated persons" (those that perform services for, or on behalf of the company, e.g. employees, agents, consultants, contractors, suppliers, joint venture partners,

subsidiaries and other professionals engaged to retain or win business) paying bribes to obtain or retain business or a business advantage for the company; e.g. If a company "carries on business in the UK" it could be prosecuted in the UK if one of its agents in Thailand paid a bribe to a distributor to supply company products; even where the company did not know that the agent was going to make such a payment.

- Some countries have laws which grant prosecutors authority to prosecute Bribery and corruption offences whether the offence occurs within or outside their borders; e.g. senior management in the UK could be prosecuted if they know and allow their employees in Thailand to pay bribes to customs officials.

3. Bribery of Public Officials

Most countries in the world have made it an offence to bribe their own Public Officials; many have also made it an offence to bribe a Foreign Public Official. It is therefore important that caution is exercised when dealing with all Public Officials and compliance with applicable laws and regulations are maintained in such transactions.

This Policy prohibits the offering, promising or giving of a financial or other advantage to Foreign Public Officials/Public Officials with the intention of influencing any official action in order to obtain or retain business or a business advantage for, or on behalf of, the Company. It is an offence to either directly or indirectly bribe a Foreign Public Official or a local Public Official.

Failure to comply with this Policy and the applicable international Anti-Bribery and Corruption laws might result in regulatory and criminal sanctions for the Company, including, but not limited to, unlimited fines and/or debarment from competing for public contracts or participating in tenders or public procurement in one or more jurisdictions. Individuals who participate in the bribing of Foreign Public Officials / Public Officials, could also face criminal sanctions, such as imprisonment.

3.1 Who is a Public Official?

For the purpose of this Policy, the term "Public Official" should be interpreted broadly to include any person, whether paid or unpaid, acting in any official capacity for, or on behalf of any government, government agency, regulatory authority, sovereign fund, state-owned company (including partially owned government companies), supranational body or public international organization, political party, regardless of his/her rank or position and whether he/she is directly employed by a government or other public sector entity.

The following is a non-exhaustive list of individuals who should be regarded as Public Officials for the purpose of this Policy:

- Members of the judiciary
- Individuals acting on behalf of political parties, party officials, political figures or candidates
- Employees of state-owned or controlled corporations – such as national oil-and-gas, electricity or transport companies
- Officers and employees of public international organizations, such as the United Nations, the World Bank and the International Monetary Fund
- Customs and immigration officials and employees
- A political party or a member of a political party
- Harbor masters, port officials and employees of coast guards

We expect you to exercise your good judgment and to always be aware about the capacity of the parties you are dealing with, whether Public Official or not. Should you have any doubt you must immediately consult your Local Reporting Manager or your Regional Compliance Manager.

3.2 Bribery

For the purpose of this Policy, the term "Bribery" should be interpreted broadly to not only include money, but to include any direct and/or indirect offers of anything of value, such as offering jobs, internships, business opportunities or the forgiveness of a debt, to any Public Official, their family members and/or closely related parties, such as business associates.

For the avoidance of doubt, any direct or indirect payments and/or offers, including payments/offers to third parties other than a Public Official; e.g. making contributions to a certain charity, which are made for the purpose of influencing the decisions or actions of a Public Official, in order to obtain or retain business or a business advantage for or on behalf of the Company, will be regarded as a bribe and is prohibited.

Prosecution authorities adopt and apply a wide interpretation to what can be classified as a bribe and the meaning of "anything of value". You should therefore be aware that anything that a reasonable person would consider valuable enough to influence the recipient's decision-making could, depending on the circumstances, be regarded as being used for Bribery purposes.

4. Commercial Bribery/Private Sector Bribery

This Policy not only prohibits Bribery of Foreign Public Officials and Public Officials; Bribery in the private sector, also referred as "private sector to private sector Bribery" is also prohibited.

As a general rule, it is a breach of this Policy to "make" a bribe or to "receive" a bribe in the course of business. Payments, or anything of value, made, offered, promised, requested, received or accepted in order to induce or reward somebody to perform their duties improperly are prohibited; for example, in breach of the expectation that he/she will act in good faith, impartially or in accordance with a position of trust. As an example, paying or promising to pay the employee of a company who has decision-making authority to close a deal, to secure a contract, to obtain favourable treatment or an award for the Company, is not permitted and might result in criminal and administrative penalties for you and the Company.

Therefore, you must not make a payment of any nature to any employee, agent and/or distributor of an outside party (including clients or potential clients) other than payments supported by a valid contract between the Company and such outside party. Commissions and agency fees should only be paid when supported by a valid contract. Any breach of these prohibitions will be taken extremely seriously.

5. Business entertainment, hospitality, meals and other gratuities

Extending business courtesies, such as entertainment or corporate gifts, is part of building and maintaining business relationships. However, we must ensure that the circumstances in which gifts and hospitality are offered, given or accepted are restricted to those which are appropriate and compliant with local laws and this Policy. As an example, offering a benefit to Public Officials, or their family members, may violate the law. In certain jurisdictions, Public Officials are prohibited from accepting any entertainment, meals, gifts or other things of value. In addition, under the UKBA, a gift might be regarded as a bribe where it was made to induce or reward somebody to perform their duties improperly.

As a general rule, you must not offer anything of value to a Public Official unless you have obtained specific permission in writing from your Regional Compliance Manager or the Compliance Officer in accordance with this Policy and the Local Gifts & Hospitality Procedure, and in particular with the guidance provided in the following paragraph.

5.1 A common sense approach for corporate hospitality and gifts

Reasonable and customary business entertainment, hospitality, meals, gifts, gratuities and such items may, under certain circumstances, be permissible if conducted in accordance with this Policy, the Local Gifts & Hospitality Procedure and with applicable local laws and regulations.

We trust your judgment in making a distinction between inexpensive, routine and modest hospitality and lavish hospitality or improper gifts/entertainment that might be offered in the hope of securing a contract or closing a deal.

The intention behind the gift or hospitality given or offered is the most important consideration. When considering offering corporate hospitality and gifts, there are several key questions to ask:

- Could the gift or hospitality be seen as unduly lavish or expensive?
- Does the gift exceed the value of EUR 75 (or the local equivalent) per person?
- Does the hospitality exceed the value of EUR 100 (or the local equivalent) per person?
- Is the recipient a Public Official?
- Does the gift or hospitality invitation extend to family members?
- Is the gift or hospitality outside industry/local norms?
- Is it intended to and/or might it be regarded as an inducement or reward for past or future business?
- Is something expected in return?
- Are there any current contractual negotiations, tenders or pitches for new business connected to this person/business/organization?
- Are we trying to outdo our competitors in order to win business?

If the answer to any of the questions above is “yes”, there is an increased risk profile for Bribery and you must immediately consult your Regional Compliance Manager/the Compliance Officer and obtain written approval before extending the proposed corporate hospitality or offering any gifts.

Prior to making or receiving any gift or hospitality, reference should be made to the Local Gifts & Hospitality Procedure.

5.2 Seeking authorization

You should comply with this Policy and the Local Gifts & Hospitality Procedure, in particular:

- a. You must inform your Regional Compliance Manager / the Compliance Officer in writing using the Gifts & Hospitality Approval Form of the reason, nature, frequency and value of the corporate hospitality or gift, as well as the name(s) and position(s) of the individual(s) to whom you intend to offer the proposed corporate hospitality or gift.
- b. Your Regional Compliance Manager/the Compliance Officer will review your request and respond to you in writing within 1–2 business days.
- c. You must not extend the proposed corporate hospitality or gift before receiving prior written consent from your Regional Compliance Manager/the Compliance Officer.

In any case, if you have any doubt with regards to the offering or accepting of hospitality or gifts, or with regard to the capacity (whether Public Official or not) of the individual(s) to whom

the offer is to be made or received, you must not offer or receive any hospitality or gifts, but you should immediately consult your Regional Compliance Manager/the Compliance Officer.

6. Working with third parties

6.1. Background

Some countries have Anti-Bribery legislation under which the Company can be held responsible and criminally liable for an act of Bribery committed by employees and third parties acting for, or on behalf of, the Company. In addition, the Company can be held responsible and criminally liable for failing to adopt and implement adequate Anti-Bribery and Corruption compliance procedures to prevent acts of Bribery being committed by employees and third parties acting for, or on behalf of, the Company.

For this purpose, a third party includes, but is not limited to, agents, contract staff, business partners, joint ventures, consultants, representatives, intermediaries, contractors and suppliers.

6.2 Third party due diligence process

In order to minimize the Bribery and Corruption risks attached to the conduct of business through third parties, the Company has adopted a process to conduct due diligence on third parties prior to engaging them to act on behalf of the Company. A key element of such due diligence process is the Third Party Due Diligence Questionnaire. The Company has also introduced comprehensive internal procedures for the ongoing monitoring of payments and business relationships with third parties. Not every proposed third party will meet the standards of the third party due diligence process. We might decline or discontinue a third party relationship if we are not satisfied by the compliance standards or by the reputation of a particular third party.

The Regional Compliance Managers are responsible for:

- Assessing and approving due diligence conducted in relation to proposed third parties
- Approving the Third Party Due Diligence Questionnaire
- Collecting the necessary documentation to endorse the information included in the Third Party Due Diligence Questionnaire
- Creating adequate records for each third party assessed

The Third Party Due Diligence Questionnaire and relevant records for the third party shall be kept for a period of at least **10 years**, so that they are available for review by the Compliance Officer at any time. The Compliance Officer will conduct periodic reviews of the Third Party Due Diligence Questionnaires and relevant records kept by Local Reporting Managers/the Regional Compliance Managers.

As a general rule, payments to third parties must not be made unless:

- **The third party has been approved by the Regional Compliance Manager/Compliance Officer in accordance with this Policy.**
- **The payment is supported by a valid contract.**

6.3 Risk-based assessment of third parties

A number of risk factors will be taken into account when conducting third party due diligence, including but not limited to:

- The location of services to be performed and the perceived “level of Corruption risk” in the country in which the third party operates on behalf of the Company
- The nature of service(s) to be provided by the third party
- The frequency and the nature of interactions with Public Officials (on the Company's behalf)
- The fee or payment structure

As a part of the third party due diligence process, your Local Reporting Manager/the Regional Compliance Manager might require you to gather and submit information and documentation about a proposed third party, e.g. copies of passports of individuals or constitutional/incorporation documents for a company. In the event of any such request, you should cooperate promptly with your Local Reporting Manager/the Regional Compliance Manager and always act in the best interest of the Company. Failure to do so might result in serious disciplinary consequences.

Third party due diligence will not be necessary in all cases. The decision as to whether third party due diligence is required will be taken by mutual decision of the Compliance Officer and the Regional Compliance Manager.

6.4 Potential risk factors (red-flags) and suspicious factors

The following is a non-exhaustive list of risk factors (**red flags**) which could indicate a potential Bribery and Corruption risk, and therefore raise the risk profile of the Company when engaging with the proposed third party:

- The third party operates on behalf of the Company in a high-risk country for Bribery and Corruption (a complete list of high-risk countries is retained by the Compliance Officer)
- Lack of a clear and substantiated business purpose by the third party
- Requests for payments to be made in cash, upfront, or to a bank in a location or country in which the third party is not located
- Excessive payments for services rendered

- Lack of detail in invoices; e.g. large non-itemized invoices or fees
- Lack of supporting documentation for invoices or expense reimbursements
- Previous investigations, prosecutions or sanctions for any Corruption related offence
- Lack of cooperation in providing requested information and documents
- Lack of transparency in any prior agreements with the third party
- Absence of publicly available information substantiating the existence of the third party
- Personal relationships between the third party and Public Officials who will be involved with, or can influence the process for which the third party has been engaged

The Local Reporting Managers and the Regional Compliance Managers are responsible for referring any red-flag situations or suspicious events that may arise during the third party due diligence process to the Compliance Officer. However, you should exercise your judgment when it comes to relationships with prospective and/or existing third parties acting for, or on behalf of, the Company.

7. Reporting breaches of Policy ("Whistleblowing")

7.1 Obligation to report

If you suspect or become aware of any breach or potential breach of this Policy by an employee or any third party acting for, or on behalf of the Company, you must immediately report the relevant events and/or any suspicious events directly to your Regional Compliance Manager/the Compliance Officer in accordance with the procedure set out in this section of the Policy and in Section N of the Code of Conduct. You must not ignore your concerns.

7.2 Making a report

The Company has adopted and implemented procedures to: (a) allow Company employees and others to submit, on a confidential basis, good faith concerns regarding violations of this Policy; and (b) the receipt, retention and treatment of complaints received by the Company regarding violations of this Policy.

Any concerns related to violations of this Policy should be reported immediately to:

- kpEthicsHotline; or**
- Your Regional Compliance Manager, the Compliance Officer or any member of the "Senior Management" (CEO or CFO); or in the event the violation of this Policy involves a member of the Senior Management, the Audit Committee should be contacted using the contact information specified in the Code of Conduct and listed at the end of this Policy.**

An employee or other individual may contact the Company's whistleblowing system "**kpEthicsHotline**", using the toll-free numbers or they may submit a complaint electronically to the Company using the web address listed in the "Reporting contact information" section at the end of this document.

In addition, any Company employee or other person may submit, on a confidential basis if preferred, any good faith concerns regarding violations of this Policy to the Company's Senior Management or the Audit Committee. Such concerns can be set out in writing and forwarded in a sealed envelope to the Company's Senior Management or the Audit Committee of the Company in an envelope labelled with words such as: *"To be opened by the Senior Management or the Audit Committee only. Submitted pursuant to the Company Code of Conduct"*.

If the individual would like to discuss the matter being reported with any member of the Senior Management or the Audit Committee, then they should indicate this in the submission and include a telephone number at which he or she might be contacted if the Senior Management or the Audit Committee deems it appropriate.

7.3 Handling of whistleblowing reports

Your concerns will be taken seriously and investigated quickly. Where permitted by local law, your anonymity will be protected if you wish. The Company will not tolerate retaliation of any kind against employees or other persons who submit complaints in good faith. Additionally, no employee will be adversely affected or disciplined by the Company because the employee refuses to carry out a directive which, in fact is a violation of any applicable laws or this Policy. However, anyone who files a complaint with the intention of spreading lies or to threaten or damage another person's reputation, will be the subject of disciplinary action.

Following the receipt of any complaint submitted in accordance with this procedure, the Compliance Officer, Senior Management or the Audit Committee will investigate each matter and, if appropriate, take corrective and disciplinary action, which may include, alone or in combination, a warning or letter of reprimand, reassignment, demotion, loss of merit increase or termination of employment/contract.

Following evaluation of relevant evidence the person(s) mentioned in the report will, where possible, be immediately notified and given an opportunity to respond; including to oppose the processing of their personal data on legitimate grounds, to access that data and to correct any inaccurate information. Notification to such person(s) may however be delayed in exceptional circumstances, in particular if it is necessary to ensure an effective internal investigation and the protection of evidence.

The Senior Management or the Audit Committee may enlist employees of the Company and/or outside legal, accounting or other advisors as appropriate, to conduct any investigation of complaints regarding any violations of this Policy. In conducting any investigation, the Senior Management or the Audit Committee will use reasonable efforts to protect the confidentiality of the complainant.

The Senior Management or the Audit Committee, as the case may be, will keep a written record of all such reports and inquiries. Personal data will be deleted immediately after investigation if the report is unsubstantiated, and within 12 months otherwise; unless the data is required for disciplinary or legal purposes.

REPORTING CONTACT INFORMATION

1. Senior Management

Daniel Dayan
Chief Executive Officer
Klöckner Pentaplast Group
Riverview Building
187 Danbury Road, 3rd Floor
Wilton, CT 06897
U.S.A.
E-Mail: d.dayan@kpfilms.com

R. Brent Jones
Chief Financial Officer
Klöckner Pentaplast Group
Riverview Building
187 Danbury Road, 3rd Floor
Wilton, CT 06897
U.S.A.
E-mail: b.jones@kpfilms.com

2. Audit Committee

Audit Committee
Klöckner Pentaplast Group
C/O Tom Dowling, Secretary
3585 Klockner Road
Gordonsville, VA 22942
E-Mail: t.dowling@kpfilms.com

3. kpEthicsHotline

<http://kp.ethicspoint.com>

4. kpEthicsHotline Toll-Free Number

Within the United States and Canada dial 877-281-5511.
All other countries, from an outside line dial the AT&T Direct Dial Access® for your location. At the prompt dial 877-281-5511. It may take 1-3 minutes to arrange for an interpreter. During this time please do not hang up.

COUNTRY	CONTACT
Argentina	Telecom 0-800-555-4288 Telefonica 0-800-222-1288
Australia	Telstra 1-800-881-011 Optus 1-800-551-155
Belarus	8^800-101
Brazil	0-800-890-0288

	(cellular) 0-800-888-8288
Canada	English 1-877-281-5511 French 1-855-350-9393
China, PRC	Southern - China Telecom 10-811 Northern - Beijing CNCG 108-888
Czechoslovakia	00-800-222-55288
Denmark	800-100-10
Egypt	Cairo 2510-0200 Cellular 02-2510-0200
France	France Telecom 0-800-99-0011 Paris only 0-800-99-0111 0-800-99-1011 0-800-99-1111 0-800-99-1211 Telecom Development 0805-701-288
Germany	0-800-225-5288
Hungary	06-800-011-11
India	000-117
Italy	800-172-444
Mexico	01-800 288-2872 Por Cobrar Spanish 01-800-112-2020 Mexico 001-800-462-4240 Spanish Operator 001-800-658-5454
Netherlands	0800-022-9111
New Zealand	000-911
Poland	0-0-800-111-1111
Portugal	800-800-128
Romania	0808-03-4288
Russia	St. Petersburg 363-2400 Moscow 363-2400 Russia 8^10-800-110-1011 (outside Moscow) 8^495-363-2400 (outside St. Petersburg) 8^812-363-2400
Slovakia	0-800-000-101
Spain	900-99-0011
Switzerland	0-800-890011
Thailand	1-800-0001-33

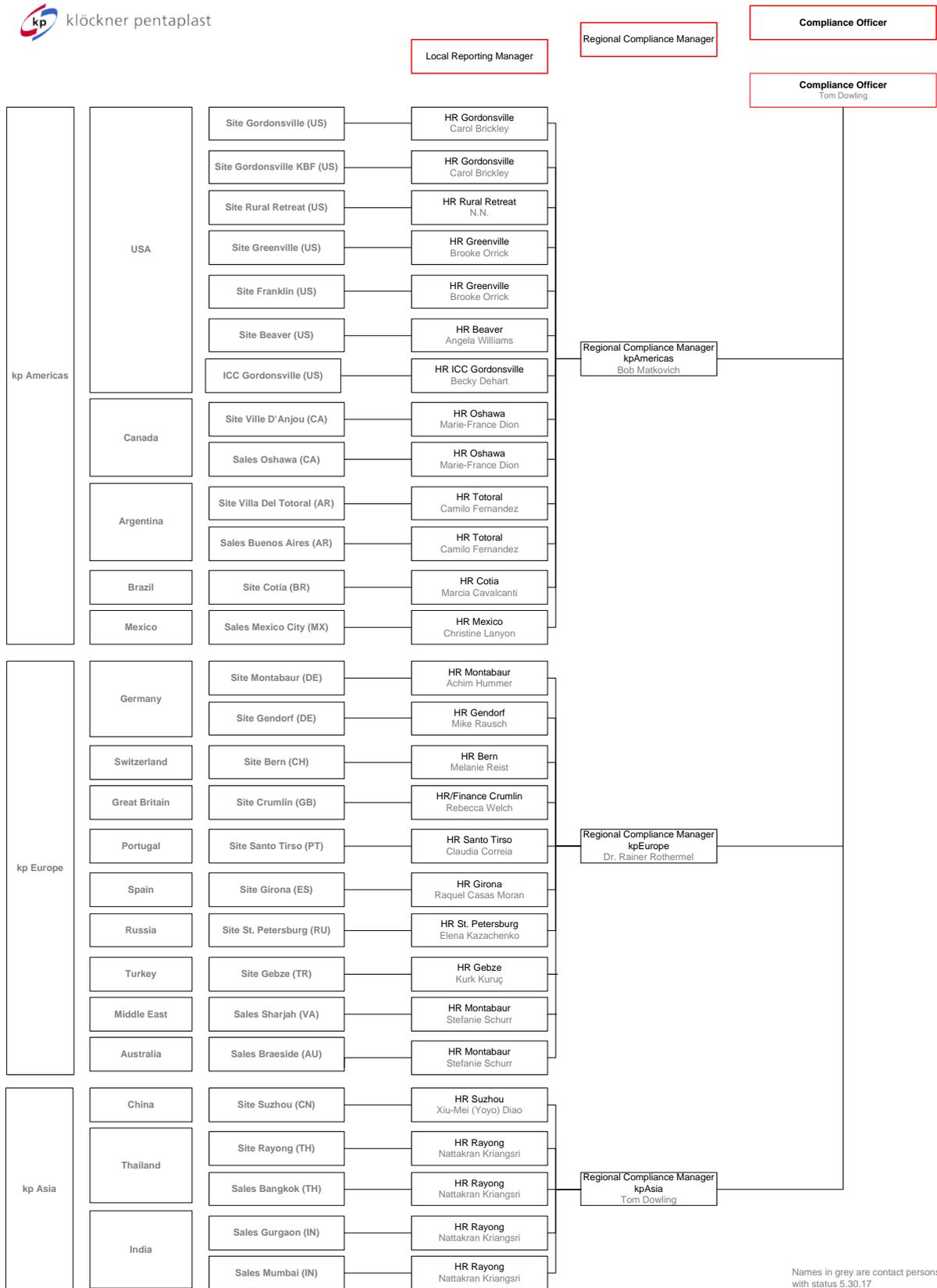
Turkey	0811-288-0001
United Arab Emirates	8000-021 US Military Bases (& cellular) 8000-061 United Arab Emirates (du) 8000-555-66
United Kingdom	BT 0-800-89-0011
United States	1-877-281-5511

LIST OF AMENDMENTS TO THIS POLICY

Any amendment/update to this Policy will be recorded by the Compliance Officer.

NO.	SECTIONS UPDATED	DATE	APPROVED BY
1.	page 2, paragraph "Queries", name of Compliance Officer has been changed	January 2015	The Board of KP Holding GmbH & Co. KG approved the appointment of R. Senft as Compliance Officer of kp Group in its meeting on Dec 18, 2014.
2.	page 13, paragraph "Making a report" and page 15, paragraph "Senior Management", Resignation of Dr. Christian Holtmann as CEO of kpGroup	February 2015	R. Senft
3.	page 2, paragraph "Queries", new Compliance Officer	January 2016	The Advisory Board of KP Holding GmbH & Co. KG approved the appointment of C. DeLanoy as Compliance Officer of kp Group as of 01 January 2016 in its meeting on 18 December 2015.
4.	page 13, paragraph 7.2, a. and page 15, 1. Senior Management	January 2016	C. DeLanoy
5.	Page 15, paragraph "Senior Management", changed M. Hoelzl to R. Brent Jones, changed M. Setzen to Richard Widden, added Peter Heinze	July 2016	C. DeLanoy
6.	Page 13, paragraph 7.2, a: deleted CTO and added CCO and COO.	July 2016	C. DeLanoy
7.	Added Turkey to Ethics Hotline and organization chart.	November 2016	C. DeLanoy
8.	Page 2, paragraph "Queries", new Compliance Officer	June 2017	R. Lence
9.	Section 7.2, a & b, revised wording for reporting	June 2017	R. Lence
10.	Page 16 "Senior Management", delete CCO and COO contact information and update Audit Committee contact information.	June 2017	R. Lence
11.	Update Senior Management and phone table	February 2018	T. Dowling
12.			
13.			
14.			
15.			
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Anti-Bribery and Corruption Organization Chart



Names in grey are contact persons with status 5.30.17